AIRFIELD & TERMINAL MODERNIZATION PROJECT

LOS ANGELES INTERNATIONAL AIRPORT (LAX)

FINAL ENVIRONMENTAL IMPACT REPORT (FINAL EIR)

Main Text

[State Clearinghouse No. 2019049020]

City of Los Angeles

Los Angeles World Airports

August 2021

LAWA

LOS ANGELES WORLD AIRPORTS

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PREFACE

This document, in conjunction with the previously prepared documents described below, constitutes the Final Environmental Impact Report (Final EIR) for the Airfield and Terminal Modernization Project at Los Angeles International Airport (LAX). As further described in the Introduction of this document, the proposed Project would implement airfield, terminal, and landside roadway improvements at LAX as part of LAWA's continuing commitment to maintain LAX as a world-class airport. The proposed Project consists of several primary elements, including airfield improvements that would enhance operational management and safety within the north airfield, new terminal facilities to upgrade passenger processing capabilities and enhance the passenger experience, and an improved system of roadways to better access the Central Terminal Area (CTA) and new facilities while routing airport-related traffic away from the public roads that serve the community.

In accordance with the California Environmental Quality Act (CEQA), Los Angeles World Airports (LAWA), as Lead Agency, has completed an EIR to disclose the environmental impacts associated with the LAX Airfield and Terminal Modernization Project.

LAWA circulated a Draft EIR regarding the proposed Project, received public and agency comments on the Draft EIR, and prepared written responses to comments that raised significant environmental issues – all of which provide the basis for this Final EIR.

In accordance with Section 15132 of the State CEQA Guidelines, the Final EIR for the LAX Airfield and Terminal Modernization Project consists of:

a) The Draft EIR with the corrections and clarifications set forth in Chapter F3 of this document
b) Comments and recommendations received on the Draft EIR
c) Lists of persons, organizations, and public agencies commenting on the Draft EIR
d) LAWA's responses to significant environmental points raised in the review and consultation process
e) Other information added by LAWA

The Final EIR includes two components, as described below.

Component 1: Draft EIR and Appendices

The Draft EIR, including appendices, was originally distributed for public review and comment from October 29, 2020 to December 14, 2020. In response to requests from the community, LAWA extended the comment period on the Draft EIR twice, first to February 12, 2021 with a second extension to March 15, 2021. In total, the Draft EIR was circulated for public review for 138 days, providing an expanded opportunity for public review and input beyond the 45-day review period required by Section 15105 of the State CEQA Guidelines. A virtual (online) public meeting was held during the Draft EIR comment period on December 1, 2020, providing an additional avenue for public involvement during the Draft EIR review and comment period. In addition, a virtual open house launched on LAWA's website on November 25, 2020 provided another method for the public to access information about the proposed Project and the Draft EIR analysis.

The Draft EIR consists of the Main Text and the following appendices:

- Appendix A – Notice of Preparation/Scoping
- Appendix B – Activity Forecasts and Operational Analyses
- Appendix C – Air Quality, Human Health Risk Assessment, Greenhouse Gas Emissions, and Energy

- Appendix D – Historic Resources Technical Report
- Appendix E – Hazardous Materials
- Appendix F – Noise
  - Appendix F.1 – Aircraft Noise Analysis Technical Report
  - Appendix F.2 – Roadway Traffic Noise Analysis Technical Report
  - Appendix F.3 – Construction Equipment Noise Analysis Technical Report
- Appendix G – Transportation
- Appendix H – Water Supply Assessment

Component 2: Responses to Comments and Corrections and Clarifications to the Draft EIR

The second part of the Final EIR consists of a compilation of the comments received on the Draft EIR, the written responses prepared by LAWA to those comments, and corrections and clarifications to the Draft EIR. This component includes indices (i.e., lists) of agencies and individuals that commented on the Draft EIR. This component also includes Attachment F3, which consists of a copy of the comment letters on the Draft EIR in their original form.

All of the documents described above, comprising the Final EIR for the LAX Airfield and Terminal Modernization Project, are available for public review online at www.lawa.org/ATMP.

F1 INTRODUCTION AND INDICES

F1.1 Introduction

In compliance with CEQA, LAWA has completed this Final EIR for the LAX Airfield and Terminal Modernization Project. As described in the preface of this document, the Final EIR for the proposed Project consists of two components, with the first component consisting of the Draft EIR and associated appendices, and the second component being Responses to Comments and Corrections and Clarifications to the Draft EIR. This document constitutes the second component of the Final EIR.

F1.1.1 Draft EIR

On October 29, 2020, LAWA published a Draft EIR for the LAX Airfield and Terminal Modernization Project. In accordance with CEQA, the Draft EIR was initially circulated for public review for more than 45 days, with the review period closing on December 14, 2020. In response to requests from the community, LAWA extended the comment period on the Draft EIR twice, first to February 12, 2021 with a second extension to March 15, 2021, for a total public review period of 138 days.

A detailed description of the proposed Project is provided in Chapter 2 in the Draft EIR. As explained in more detail in that chapter, the proposed Project includes airfield improvements, concourse and terminal improvements, and landside roadway improvements within the northern and eastern portions of LAX. The proposed Project would support the ongoing modernization of LAX by enhancing the safety and operational management of the airfield, particularly as related to runway exits; providing a new concourse and terminal to improve the quality of the passenger experience and efficiency of passenger processing; and improving the roadway system to better route airport-related traffic away from the public roads that serve the community. These improvements would help LAX to prepare for the continued aviation growth that is projected by LAWA, the Southern California Association of Governments (SCAG), and the Federal Aviation Administration (FAA) to occur at LAX. Additionally, the nature and timing of improvements included in the proposed Project are integral to Los Angeles' plans to host the 2028 Olympic and Paralympic Games, with LAX serving as the main portal for athletes, dignitaries, and visitors from around the world.

The proposed Project includes the following elements:

- Taxiway D Extension West
- Runway 6L-24R Exits
- Concourse 0
- Terminal 9, including a new parking facility and construction of a seventh Automated People Mover (APM) station at Terminal 9 on the previously-approved LAX APM line, as well as construction of a pedestrian corridor between Terminals 8 and 9 that would bridge across Sepulveda Boulevard
- Removal and replacement of 15 of the 18 West Remote Gates
- Roadway system improvements

The proposed Project would also include various other elements to support the primary Project components, including:

- Utilities infrastructure, both new and modified, to support the proposed Project, including domestic water, fire water, reclaimed water, electrical and communication systems, natural gas and fuel systems, and stormwater and wastewater systems

- Land acquisition, subdivision of parcels, billboard removal, and/or other reconfiguration of parcels, dedications and vacations of public rights-of-way
- Building design and construction features in accordance with LAWA's Sustainable Design and Construction Policy, which requires that new buildings be designed to achieve a minimum of the United States Green Building Council's Leadership in Energy and Environmental Design (LEED®) Silver certification[1]
- Enabling projects to allow construction of the proposed Project, including utility relocation and demolition of certain existing facilities
- Streetscape improvements and public street improvements, including sidewalks, curbs, and gutters

Construction of the proposed Project would be phased and would occur between 2022 and 2028.

F1.1.2 Final EIR

In accordance with State CEQA Guidelines Section 15088, LAWA prepared responses to all environmental comments received on the Draft EIR. As required by the State CEQA Guidelines, the focus of the responses to comments is on "the disposition of significant environmental issues raised." State CEQA Guidelines Section 15088(c). Detailed responses are not provided to comments on the merits of the LAX Airfield and Terminal Modernization Project or on other topics that do not relate to significant environmental issues. As discussed below, all comments received on the Draft EIR will be forwarded, as part of this Final EIR, to the decision-makers for their consideration prior to taking any action on the LAX Airfield and Terminal Modernization Project.

This document, which is the second component of the Final EIR, presents the comments received during the public review period for the Draft EIR and provides written responses to those comments. For purposes of this Final EIR, written letters and emailed comments are both referred to as "comment letters." A total of 55 comment letters were received during the public review period, and two comment letters were received after the close of the public review period, for a total of 57 letters. Responses to the comment letters received after the close of the comment period are included in this Final EIR. The indices presented at the end of this chapter list the agencies, organizations, and individuals that submitted comments on the Draft EIR. In some cases, more than one comment letter was received from the same commenter; each comment letter received is listed separately in the indices. Copies of all comment letters received are included in Attachment F3 of this document. Chapter F2 of this document presents, on a letter-by-letter basis, each comment, which is then followed immediately by a response, for all comments received. The comments and responses are organized and grouped together into categories based on the affiliation of the commenter. The comments are presented in the following order: state agencies, regional agencies, local agencies, and public comments (i.e., letters from private citizens, organizations, etc.). Chapter F3 of this document provides corrections and clarifications to information presented in the Draft EIR.

Together with the Draft EIR, the responses to comments, along with corrections and clarifications to the Draft EIR, lists of commenters, and attachments, constitute the Final EIR. Pursuant to CEQA, the Final EIR is being prepared not less than ten days prior to certification of the Final EIR. LAWA has determined it is not necessary to circulate the Draft EIR, in whole or in part, for another round of public review and comment. The Final EIR will be presented to the decision-makers for their use in considering the LAX Airfield and Terminal Modernization Project. Decision-makers will decide whether to certify the Final

[1] City of Los Angeles, Los Angeles World Airports, *LAWA Sustainable Design and Construction Policy*, September 7, 2017. Available: https://www.lawa.org/-/media/lawa-web/tenants411/file/lawa-sustainable-design-and-construction-policy.ashx.

EIR pursuant to Public Resources Code Section 21082.1 (c), prior to making any decision whether to approve the LAX Airfield and Terminal Modernization Project.

F1.2 Indices of Comment Letters

An alphanumeric index system is used to identify each comment and response, and is keyed to each letter and the individual comments therein. For example, the first (and only) letter within the group of state agencies submitting comments on the LAX Airfield and Terminal Modernization Project Draft EIR is from the California Department of Transportation (Caltrans). The subject letter was assigned the alphanumeric label "ATMP-AS001," representing "Airfield and Terminal Modernization Project-Agency-State-Letter No. 1." The individual comments within the letter are labeled as ATMP-AS001-1, ATMP-AS001-2, etc. The same basic format and approach is used for the comment letters from regional agencies ("AR"), local agencies ("AL"), and public comments ("PC"). Within each letter, comments have been subdivided further into particular issues. For example, the letter from Caltrans – ATMP-AS001 – is considered to have 11 individual comments; the division of the letter into 11 separately designated comments is intended to enable the reader to identify readily the particular comment to which a response is addressed.

The following are the prefix codes used for categorizing the comment letter types:

Letter ID Prefix	Description
AS	State Agency
AR	Regional Agency
AL	Local Agency
PC	Public Comment

To assist the reader's review and use of the responses to comments, three indices are provided. These indices provide the alphanumeric label number, commenter name, affiliation (i.e., name of agency or organization that the author represents, if provided), and date (if provided) of each comment letter. The first index lists all of the comment letters by alphanumeric label number, the second index lists all of the comment letters by the commenter's last name, and the third index lists all of the comment letters by the affiliation, if any was identified, of the commenter.

The responses to comments consist of both topical responses and individual responses. Within the individual comments submitted on the Draft EIR, many of the same issues were raised by multiple commenters, and many comments pertained to a general theme that was common to multiple commenters. To respond to these comments, topical responses were prepared that provide a single comprehensive discussion of the issue of concern. A total of eight topical responses are provided. Each topical response ("TR") has an alphanumeric designation related to its general subject matter. For example, the topical response pertaining to air quality and greenhouse gas (GHG) emissions is designated "TR-ATMP-AQ/GHG-1." Topical responses that are not specific to an environmental resource area are designated with a “G,” indicating that the topical response addresses general issues related to the proposed Project and the Draft EIR. Individual comments are cross-referenced to these topical responses. The topical responses are provided in Chapter F2.

Chapter F2 also provides individual comments and responses, presented on a letter-by-letter basis. Each comment is presented exactly as it appears in the original comment letter. No corrections to typographical errors or other edits to the original comments were made. A copy of each original comment letter is provided in Attachment F3 of this Final EIR.

Immediately following each comment is a written response developed by LAWA. In many instances, the response to a particular comment may refer to the response(s) to another comment(s) that expressed the same concern or is otherwise related. Cross-referencing of responses uses the alphanumeric index system described above. For example, a response may indicate "Please see Response to Comment ATMP-AL001-2" if that response addresses the same concern expressed in a different comment.

Following are the three indices that organize comment letters by letter identification number, commentor and affiliation.

Index by Letter Identification (ID) Number			
Letter ID	**Commenter**	**Affiliation**	**Date**
ATMP-AS001	Lin, Alan	State of California, Department of Transportation	12/7/2020
ATMP-AR001	Leger, David	South Bay Cities Council of Governments	11/10/2020
ATMP-AR002	Bacharach, Jacki	South Bay Cities Council of Governments	2/26/2021
ATMP-AR003	Sun, Lijin	South Coast Air Quality Management District	3/12/2021
ATMP-AL001	Mitnick, Scott	City of El Segundo	10/30/2020
ATMP-AL002	Mitnick, Scott	City of El Segundo	1/12/2021
ATMP-AL003	Mitnick, Scott	City of El Segundo	2/18/2021
ATMP-AL004	Brand, Mayor William	City of Redondo Beach	3/11/2021
ATMP-AL005	Mihranian, Ara Michael	City of Rancho Palos Verdes	3/15/2021
ATMP-AL006	Tai, Carrie	City of Manhattan Beach	3/15/2021
ATMP-AL007	Massey, Mayor Justin	City of Hermosa Beach	3/15/2021
ATMP-AL008	Bonin, Councilmember Mike	City of Los Angeles	3/15/2021
ATMP-AL009	Guerrero Jr., Edward	City of Los Angeles, Department of Transportation	3/15/2021
ATMP-AL010	Petta, Joseph "Seph"	Shute, Mihaly & Weinberger LLP, on behalf of City of El Segundo	3/15/2021
ATMP-AL011	Jackson Sr., Christopher E.	City of Inglewood, Economic and Community Development Department	3/15/2021
ATMP-AL012	Naaseh, Saied	City of Carson	3/22/2021
ATMP-AL013	Hahn, Supervisor Janice	County of Los Angeles Board of Supervisors	4/1/2021
ATMP-PC001	Johnston, Mark R.	None Specified	10/29/2020
ATMP-PC002	C., Julie	None Specified	11/1/2020
ATMP-PC003	Trembath, Phil	Spirit CHb Inc	11/7/2020
ATMP-PC004	Cua, Hans	None Specified	11/13/2020
ATMP-PC005	Moskin, Jeffrey M.	Raintree Condo and Townhouse Assn	11/20/2020
ATMP-PC006	Adams, Cary	None Specified	11/12/2020
ATMP-PC007	Aelony, Shana	None Specified	11/10/2020
ATMP-PC008	Francis, Grant	None Specified	11/25/2020
ATMP-PC009	Williams, Ryan	Lennox School District	12/2/2020
ATMP-PC010	Rabkin, Alan	None Specified	12/3/2020
ATMP-PC011	McKinnon, Christopher	None Specified	12/5/2020
ATMP-PC012	Lanza-Campos, Denia	Walsh Construction Company	12/7/2020

Index by Letter Identification (ID) Number			
Letter ID	**Commenter**	**Affiliation**	**Date**
ATMP-PC013	Grace, Patricia	None Specified	12/24/2020
ATMP-PC014	Su, Kevin	None Specified	12/1/2020
ATMP-PC015	King, Coby	None Specified	1/12/2021
ATMP-PC016	Proffitt, Janet Lee	None Specified	1/14/2021
ATMP-PC017	Iselin, ODonnel	None Specified	1/31/2021
ATMP-PC018	Lall, Jessica	Central City Association of Los Angeles	2/9/2021
ATMP-PC019	Peters, Lori and David Anderson	LAX Airline Airport Affairs Committee	2/24/2021
ATMP-PC020	Gaytan, Enrique	LAXFUEL Corporation	3/5/2021
ATMP-PC021	Miller, Dennis	Neighborhood Council of Westchester Playa (NCWP) Residential District 11	11/29/2020
ATMP-PC022	Martin, Jane	SEIU USWW	11/30/2020
ATMP-PC023	Carstens, Douglas P.	Chatten-Brown, Carstens & Minteer LLP, on behalf of Alliance for a Regional Solution to Airport Congestion	1/11/2021
ATMP-PC024	Landreth, Lloyd W.	Landreth Law Firm PLC, on behalf of LAWTFC	3/12/2021
ATMP-PC025	Gerez, Paula	Neighborhood Council of Westchester Playa (NCWP)	3/13/2021
ATMP-PC026	Munoz, Armando	SEIU USWW	3/15/2021
ATMP-PC027	Clark, Brian	UCLA	3/15/2021
ATMP-PC028	Wagner, Debi	None Specified	3/15/2021
ATMP-PC029	Turner, Kimberly L.	None Specified	3/15/2021
ATMP-PC030	Neal, Lashantae	SEIU USWW	3/15/2021
ATMP-PC031	Wagner, Suellen	None Specified	3/15/2021
ATMP-PC032	Specchierla, Tony	None Specified	3/15/2021
ATMP-PC033	Robinson, Tristan	Ashurst LLP	12/1/2020
ATMP-PC034	Munoz, Armando	SEIU USWW	12/1/2020
ATMP-PC035	Sisson, Jordan R.	Law Office of Gideon Kracov, on behalf of Service Employees International Union, United Service Workers and UNITE HERE Local 11	3/15/2021
ATMP-PC036	Alexander, David Kimball	None Specified	3/15/2021
ATMP-PC037	Davis, Christina V.	LAX Coastal Chamber of Commerce	3/14/2021
ATMP-PC038	Acherman, Robert	Alliance for a Regional Solution to Airport Congestion	3/15/2021
ATMP-PC039	Gerez, Paula	Neighborhood Council of Westchester Playa (NCWP)	1/12/2021
ATMP-PC040	Sisson, Jordan R.	Law Office of Gideon Kracov	1/12/2021

Index by Commenter			
Commenter	**Affiliation**	**Date**	**Letter ID**
Acherman, Robert	Alliance for a Regional Solution to Airport Congestion	3/15/2021	ATMP-PC038
Adams, Cary	None Specified	11/12/2020	ATMP-PC006
Aelony, Shana	None Specified	11/10/2020	ATMP-PC007
Alexander, David Kimball	None Specified	3/15/2021	ATMP-PC036
Bacharach, Jacki	South Bay Cities Council of Governments	2/26/2021	ATMP-AR002
Bonin, Councilmember Mike	City of Los Angeles	3/15/2021	ATMP-AL008
Brand, Mayor William	City of Redondo Beach	3/11/2021	ATMP-AL004
C., Julie	None Specified	11/1/2020	ATMP-PC002
Carstens, Douglas P.	Chatten-Brown, Carstens & Minteer LLP, on behalf of Alliance for a Regional Solution to Airport Congestion	1/11/2021	ATMP-PC023
Clark, Brian	UCLA	3/15/2021	ATMP-PC027
Cua, Hans	None Specified	11/13/2020	ATMP-PC004
Davis, Christina V.	LAX Coastal Chamber of Commerce	3/14/2021	ATMP-PC037
Francis, Grant	None Specified	11/25/2020	ATMP-PC008
Gaytan, Enrique	LAXFUEL Corporation	3/5/2021	ATMP-PC020
Gerez, Paula	Neighborhood Council of Westchester Playa (NCWP)	1/12/2021	ATMP-PC039
Gerez, Paula	Neighborhood Council of Westchester Playa (NCWP)	3/13/2021	ATMP-PC025
Grace, Patricia	None Specified	12/24/2020	ATMP-PC013
Guerrero Jr., Edward	City of Los Angeles, Department of Transportation	3/15/2021	ATMP-AL009
Hahn, Supervisor Janice	County of Los Angeles Board of Supervisors	4/1/2021	ATMP-AL013
Iselin, ODonnel	None Specified	1/31/2021	ATMP-PC017
Jackson Sr., Christopher E.	City of Inglewood, Economic and Community Development Department	3/15/2021	ATMP-AL011
Johnston, Mark R.	None Specified	10/29/2020	ATMP-PC001
King, Coby	None Specified	1/12/2021	ATMP-PC015
Lall, Jessica	Central City Association of Los Angeles	2/9/2021	ATMP-PC018
Landreth, Lloyd W.	Landreth Law Firm PLC, on behalf of LAWTFC	3/12/2021	ATMP-PC024
Lanza-Campos, Denia	Walsh Construction Company	12/7/2020	ATMP-PC012
Leger, David	South Bay Cities Council of Governments	11/10/2020	ATMP-AR001
Lin, Alan	State of California, Department of Transportation	12/7/2020	ATMP-AS001
Martin, Jane	SEIU USWW	11/30/2020	ATMP-PC022

Index by Commenter			
Commenter	**Affiliation**	**Date**	**Letter ID**
Massey, Mayor Justin	City of Hermosa Beach	3/15/2021	ATMP-AL007
McKinnon, Christopher	None Specified	12/5/2020	ATMP-PC011
Mihranian, Ara Michael	City of Rancho Palos Verdes	3/15/2021	ATMP-AL005
Miller, Dennis	Neighborhood Council of Westchester Playa (NCWP) Residential District 11	11/29/2020	ATMP-PC021
Mitnick, Scott	City of El Segundo	10/30/2020	ATMP-AL001
Mitnick, Scott	City of El Segundo	1/12/2021	ATMP-AL002
Mitnick, Scott	City of El Segundo	2/18/2021	ATMP-AL003
Moskin, Jeffrey M.	Raintree Condo and Townhouse Assn	11/20/2020	ATMP-PC005
Munoz, Armando	SEIU USWW	12/1/2020	ATMP-PC034
Munoz, Armando	SEIU USWW	3/15/2021	ATMP-PC026
Naaseh, Saied	City of Carson	3/22/2021	ATMP-AL012
Neal, Lashantae	SEIU USWW	3/15/2021	ATMP-PC030
Peters, Lori and David Anderson	LAX Airline Airport Affairs Committee	2/24/2021	ATMP-PC019
Petta, Joseph "Seph"	Shute, Mihaly & Weinberger LLP, on behalf of City of El Segundo	3/15/2021	ATMP-AL010
Proffitt, Janet Lee	None Specified	1/14/2021	ATMP-PC016
Rabkin, Alan	None Specified	12/3/2020	ATMP-PC010
Robinson, Tristan	Ashurst LLP	12/1/2020	ATMP-PC033
Sisson, Jordan R.	Law Office of Gideon Kracov	1/12/2021	ATMP-PC040
Sisson, Jordan R.	Law Office of Gideon Kracov, on behalf of Service Employees International Union, United Service Workers and UNITE HERE Local 11	3/15/2021	ATMP-PC035
Specchierla, Tony	None Specified	3/15/2021	ATMP-PC032
Su, Kevin	None Specified	12/1/2020	ATMP-PC014
Sun, Lijin	South Coast Air Quality Management District	3/12/2021	ATMP-AR003
Tai, Carrie	City of Manhattan Beach	3/15/2021	ATMP-AL006
Trembath, Phil	Spirit CHb Inc	11/7/2020	ATMP-PC003
Turner, Kimberly L.	None Specified	3/15/2021	ATMP-PC029
Wagner, Debi	None Specified	3/15/2021	ATMP-PC028
Wagner, Suellen	None Specified	3/15/2021	ATMP-PC031
Williams, Ryan	Lennox School District	12/2/2020	ATMP-PC009

Index by Affiliation			
Affiliation	**Commenter**	**Date**	**Letter ID**
Alliance for a Regional Solution to Airport Congestion	Acherman, Robert	3/15/2021	ATMP-PC038
Ashurst LLP	Robinson, Tristan	12/1/2020	ATMP-PC033
Central City Association of Los Angeles	Lall, Jessica	2/9/2021	ATMP-PC018
Chatten-Brown, Carstens & Minteer LLP, on behalf of Alliance for a Regional Solution to Airport Congestion	Carstens, Douglas P.	1/11/2021	ATMP-PC023
City of Carson	Naaseh, Saied	3/22/2021	ATMP-AL012
City of El Segundo	Mitnick, Scott	10/30/2020	ATMP-AL001
City of El Segundo	Mitnick, Scott	1/12/2021	ATMP-AL002
City of El Segundo	Mitnick, Scott	2/18/2021	ATMP-AL003
City of Hermosa Beach	Massey, Mayor Justin	3/15/2021	ATMP-AL007
City of Inglewood, Economic and Community Development Department	Jackson Sr., Christopher E.	3/15/2021	ATMP-AL011
City of Los Angeles	Bonin, Councilmember Mike	3/15/2021	ATMP-AL008
City of Los Angeles, Department of Transportation	Guerrero Jr., Edward	3/15/2021	ATMP-AL009
City of Manhattan Beach	Tai, Carrie	3/15/2021	ATMP-AL006
City of Rancho Palos Verdes	Mihranian, Ara Michael	3/15/2021	ATMP-AL005
City of Redondo Beach	Brand, Mayor William	3/11/2021	ATMP-AL004
County of Los Angeles Board of Supervisors	Hahn, Supervisor Janice	4/1/2021	ATMP-AL013
Landreth Law Firm PLC, on behalf of LAWTFC	Landreth, Lloyd W.	3/12/2021	ATMP-PC024
Law Office of Gideon Kracov	Sisson, Jordan R.	1/12/2021	ATMP-PC040
Law Office of Gideon Kracov, on behalf of Service Employees International Union, United Service Workers and UNITE HERE Local 11	Sisson, Jordan R.	3/15/2021	ATMP-PC035
LAX Airline Airport Affairs Committee	Peters, Lori and David Anderson	2/24/2021	ATMP-PC019
LAX Coastal Chamber of Commerce	Davis, Christina V.	3/14/2021	ATMP-PC037
LAXFUEL Corporation	Gaytan, Enrique	3/5/2021	ATMP-PC020
Lennox School District	Williams, Ryan	12/2/2020	ATMP-PC009
Neighborhood Council of Westchester Playa (NCWP) Residential District 11	Miller, Dennis	11/29/2020	ATMP-PC021
Neighborhood Council of Westchester Playa (NCWP)	Gerez, Paula	1/12/2021	ATMP-PC039
Neighborhood Council of Westchester Playa (NCWP)	Gerez, Paula	3/13/2021	ATMP-PC025
None Specified	Adams, Cary	11/12/2020	ATMP-PC006
None Specified	Aelony, Shana	11/10/2020	ATMP-PC007

Index by Affiliation			
Affiliation	**Commenter**	**Date**	**Letter ID**
None Specified	Alexander, David Kimball	3/15/2021	ATMP-PC036
None Specified	C., Julie	11/1/2020	ATMP-PC002
None Specified	Cua, Hans	11/13/2020	ATMP-PC004
None Specified	Francis, Grant	11/25/2020	ATMP-PC008
None Specified	Grace, Patricia	12/24/2020	ATMP-PC013
None Specified	Iselin, ODonnel	1/31/2021	ATMP-PC017
None Specified	Johnston, Mark R.	10/29/2020	ATMP-PC001
None Specified	King, Coby	1/12/2021	ATMP-PC015
None Specified	McKinnon, Christopher	12/5/2020	ATMP-PC011
None Specified	Proffitt, Janet Lee	1/14/2021	ATMP-PC016
None Specified	Rabkin, Alan	12/3/2020	ATMP-PC010
None Specified	Specchierla, Tony	3/15/2021	ATMP-PC032
None Specified	Su, Kevin	12/1/2020	ATMP-PC014
None Specified	Turner, Kimberly L.	3/15/2021	ATMP-PC029
None Specified	Wagner, Debi	3/15/2021	ATMP-PC028
None Specified	Wagner, Suellen	3/15/2021	ATMP-PC031
Raintree Condo and Townhouse Assn	Moskin, Jeffrey M.	11/20/2020	ATMP-PC005
SEIU USWW	Martin, Jane	11/30/2020	ATMP-PC022
SEIU USWW	Munoz, Armando	12/1/2020	ATMP-PC034
SEIU USWW	Munoz, Armando	3/15/2021	ATMP-PC026
SEIU USWW	Neal, Lashantae	3/15/2021	ATMP-PC030
Shute, Mihaly & Weinberger LLP, on behalf of City of El Segundo	Petta, Joseph "Seph"	3/15/2021	ATMP-AL010
South Bay Cities Council of Governments	Bacharach, Jacki	2/26/2021	ATMP-AR002
South Bay Cities Council of Governments	Leger, David	11/10/2020	ATMP-AR001
South Coast Air Quality Management District	Sun, Lijin	3/12/2021	ATMP-AR003
Spirit CHb Inc	Trembath, Phil	11/7/2020	ATMP-PC003
State of California, Department of Transportation	Lin, Alan	12/7/2020	ATMP-AS001
UCLA	Clark, Brian	3/15/2021	ATMP-PC027
Walsh Construction Company	Lanza-Campos, Denia	12/7/2020	ATMP-PC012

F2 COMMENTS AND RESPONSES

The following provides the Topical Responses and individual responses to comments received on the LAX Airfield and Terminal Modernization Project Draft EIR.

F2.1 Topical Responses

TR-ATMP-G-1: Aviation Demand Forecast

Introduction

Numerous comments received on the LAX Airfield and Terminal Modernization Project Draft EIR relate to the assumed growth in passenger and aircraft operation activity documented in the Draft EIR. As summarized in Section 2.3.1.2.2 of the Draft EIR, forecasts of annual aircraft operations and passenger activity at LAX were developed in 2019 on behalf of LAWA to support the planning efforts for the proposed Project. These forecasts are documented in Appendix B.1 of the Draft EIR. This topical response provides a discussion of four aspects associated with forecasting growth in passenger and aircraft operation activity: 1) aviation activity forecasting background; 2) factors that influence airline schedules and passenger demand; 3) major disruptive historical events and associated recovery at LAX; and 4) forecasted passenger and aircraft operation activity in light of the COVID-19 global pandemic. This topical response demonstrates the validity of the aviation activity forecasting LAWA conducted for the proposed Project. This topical response also explains why, despite the effects of the COVID-19 pandemic, the Draft EIR's assumptions in terms of passenger and airline activity remain valid, although the impacts of this activity are likely not to be felt for several years later than previously assumed. As a result, the Draft EIR's analysis of impacts in 2028 can be considered conservative.

Aviation Activity Forecasting Background

Aviation Activity Forecasting Techniques

As discussed in Section 3.2.2 of Appendix B.1 of the Draft EIR, aviation activity forecasting can be conducted using various forecasting techniques, per guidance provided by the Federal Aviation Administration (FAA). The FAA reviews and approves local aviation activity forecasts and forecast methodology to ensure that they are appropriate and that they provide an adequate justification for the scope, and timing of proposed airport development. FAA field offices can approve local forecasts if the forecast methodology is reasonable and the forecast is consistent with the FAA's Terminal Area Forecast (TAF) or if differences with the TAF have been resolved by the FAA.

FAA Advisory Circular 150/5070-6B discusses the most common forecasting techniques used as the basis for airport planning analyses, as follows:[1]

- Regression analysis: This is a statistical technique that ties aviation demand (dependent variables), such as enplanements, to economic measures (independent variables), such as population and income.
- Trend analysis and extrapolation: This technique uses recorded historical patterns and trends, and extrapolates future activity forecast results based on assumed future trends.

[1] U.S. Department of Transportation, Federal Aviation Administration, Advisory Circular 150/5070-6B, Change 2, *Airport Master Plans*, January 27, 2015, Paragraph 704, pp 39-40. Available: https://www.faa.gov/airports/resources/advisory_circulars/index.cfm/go/document.information/documentID/22329.

- Market share analysis: This technique assumes a top-down relationship between national, regional, and local forecasts. Local forecasts are a market share (percentage) of regional forecasts, which are a market share (percentage) of national forecasts. Historical market shares are calculated and used as a basis for projecting future aviation activity levels.

The FAA further recommends that aviation forecasters use their professional judgment to determine which forecasting technique is most appropriate for the airport being studied.[2] For the proposed Project's aviation forecasts, LAWA relied on the expertise of its consultants Ricondo & Associates, Inc. (Ricondo). Ricondo is a full-service aviation consultancy specializing in airport planning and business management services in support of airport owners and operators, airlines, and federal and state agencies. Ricondo has supported LAWA since early 2000 and employs professional experts in airspace and airfield planning and operational analyses and simulations, as well as forecasting and terminal planning.

As documented in Section 3.2.2 of Appendix B.1, LAWA's aviation experts selected an industry-standard regression analysis based on socioeconomic factors as the most appropriate forecasting methodology for an airport such as LAX. Forecasting aviation activity at LAX has historically been done using regression analyses because of the large amount of historical data available and the fact that passenger demand highly correlates with socioeconomic factors (such as population and income), which is integral to obtaining reasonable and reliable regression analysis results. Historical data and socioeconomic factors were documented in Sections 2.1 and 3.2.2 of Appendix B.1. Although the other two forecasting techniques discussed above (trend analysis and market shares) were not selected as the primary forecasting method, historical trends and market share information were considered in the development of the forecasts documented in Appendix B.1.

The regression analysis method is independent of the proposed Project improvements. The unconstrained forecast results presented in Section 3.4 of Appendix B.1 would have been the same regardless of the proposed Project airfield or terminal improvements, because they were the results of an independent regression analysis focused on evaluating the relationship between aviation demand (dependent variables, such as enplanements) and economic measures (independent variables, such as population and income). Thus, even if the proposed Project involved entirely different airfield or terminal improvements, the unconstrained forecast results presented in Section 3.4 of Appendix B.1 would not change. Once the passenger and aircraft operation demand were forecasted, LAWA's aviation experts assessed the ability of the existing facilities (under the No Project scenario) at LAX to accommodate such demand, as documented in Section 4 of Appendix B.1, and further identified a constrained demand scenario which reflected LAX-specific limitations of the airfield system component. LAWA's aviation experts then performed a gating analysis to assess the ability of the existing facilities at LAX, plus those associated with the proposed Project, to accommodate such demand. In this fashion, LAWA's aviation experts were able to compare the ability of airport terminal facilities to accommodate anticipated demand without the proposed Project to such ability with the proposed Project.

Forecast Timeframes

As defined by the FAA, aviation activity forecasts can be prepared for different timeframes: short-term (up to five years); medium-term (between six and ten years); and long-term (beyond 10 years).[3]

As noted in Section 1 of Appendix B.1, the activity forecasts prepared for the LAX Airfield and Terminal Modernization Project extend to Fiscal Year (FY) 2045 to coincide with the horizon year of the 2020-2045

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[2] U.S. Department of Transportation, Federal Aviation Administration, *Forecasting Aviation Activity by Airport*, April 2001, p. 3. Available: https://www.faa.gov/airports/planning_capacity/.

[3] U.S. Department of Transportation, Federal Aviation Administration, Advisory Circular 150/5070-6B, Change 2, *Airport Master Plans*, January 27, 2015, Paragraph 702, p. 37. Available: https://www.faa.gov/airports/resources/advisory_circulars/index.cfm/go/document.information/documentID/22329.

Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) prepared by the Southern California Association of Governments (SCAG), known as Connect SoCal.[4] The forecast horizon year of FY 2045 also coincides with the horizon year of the 2019 TAF[5,6] prepared by the FAA.

As documented in Section 1.1 of Appendix B.1, the technical analyses prepared for the Draft EIR for horizon year 2028 were based on the results of the activity forecast. Please refer to Topical Response TR-ATMP-G-3 regarding the selection of this horizon year for impact analyses for the LAX Airfield and Terminal Modernization Project Draft EIR.

As further documented in Section 3.2.1 of Appendix B.1 and in the attachment to Appendix B.1 of the Draft EIR (LAX Airfield and Terminal Modernization Project Forecasts Comparison with 2019 FAA Terminal Area Forecast Results), the FAA requires two timeframes to be analyzed to support its consistency review of airport sponsors' forecasts: a 5-year forecast period and a 10-year forecast period. In the case of the LAX Airfield and Terminal Modernization Project, these timeframes translate to 2023 and 2028, with a baseline year of 2018. These timeframes, and associated forecasted passenger and aircraft operations, are documented in the attachment to Appendix B.1. Accordingly, the FAA considers a forecast consistent with the FAA's TAF if the results differ by less than 10 percent in the 5-year forecast period, and by less than 15 percent in the 10-year forecast period.[7]

On September 30, 2020, following its review, the FAA approved the LAX Airfield and Terminal Modernization Project forecast as consistent with the most recent TAF, as documented in the introductory pages to Appendix B of the Draft EIR.

It is important to note that short-term variations in activity as a result of changes in economic activity or geopolitical considerations do not undermine the validity of long-term forecast results. Uncertainties are inherent in the process of forecasting, as further discussed below. As documented in Section 2.2.2 of Appendix B.1, it was assumed that it is unlikely that short-term events (such as geopolitical considerations) would impede LAX's future growth over the long-term. History has demonstrated (as further documented below) that LAX's passenger demand has been resilient to short-term events and has consistently rebounded over the long-term horizon. Thus, even if geopolitical or economic events lead to short-term fluctuations in LAX's passenger demand, in time demand reverts to the long-term trend. The impacts of the COVID-19 global pandemic are also discussed below.

Forecasting Uncertainties

As noted in FAA guidance on aviation activity forecasting, any forecast of demand has an element of uncertainty.[8] Uncertainty, however, does not undermine the validity of a forecast, so long as the forecast is based on reasonable planning assumptions, uses current data, and is developed using appropriate forecast methods.[9]

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4 Southern California Association of Governments, *Connect SoCal: The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments*, adopted September 3, 2020. Available: https://www.connectsocal.org/Documents/Adopted/0903fConnectSoCal-Plan.pdf.

5 The Terminal Area Forecast (TAF) is the official FAA forecast of aviation activity for U.S. airports. The forecasts are prepared by the FAA to meet the budget and planning needs of the FAA. Airport sponsor forecasts (such as the LAX Airfield and Terminal Modernization Project activity forecasts) are considered consistent with the TAF if the results differ by less than 10 percent in the 5-year forecast period, and 15 percent in the 10-year forecast period. See U.S. Department of Transportation, Federal Aviation Administration, *Review and Approval of Aviation Forecasts*, June 2008, p.1. Available: https://www.faa.gov/airports/planning_capacity/media/approval_local_forecasts_2008.pdf.

6 The 2019 FAA TAF results for LAX are provided in Table 1 of the attachment to Appendix B.1 of the Draft EIR.

7 U.S. Department of Transportation, Federal Aviation Administration, *Review and Approval of Aviation Forecasts*, June 2008, p.1. Available: https://www.faa.gov/airports/planning_capacity/media/approval_local_forecasts_2008.pdf.

8 U.S. Department of Transportation, Federal Aviation Administration, *Forecasting Aviation Activity by Airport*, April 2001, p. 15. Available: https://www.faa.gov/airports/planning_capacity/.

9 U.S. Department of Transportation, Federal Aviation Administration, *Review and Approval of Aviation Forecasts*, June 2008, p.1. Available: https://www.faa.gov/airports/planning_capacity/media/approval_local_forecasts_2008.pdf.

The specific uncertainties inherent in the Draft EIR's aviation forecast are discussed in Section 3.2.1 of Appendix B.1. Acknowledging these uncertainties is prudent because history demonstrates that unexpected fluctuations in the economy, aviation industry practices, passenger demand, and other known and unknown factors may result in LAX annual passengers and aircraft operations increasing or decreasing at a different rate than expected. It is reasonable to assume that this is why the FAA allows a certain percentage of variance between the results of an airport sponsor's forecast and the FAA TAF, as discussed above.

The degree of uncertainty is also inextricably linked to forecast timeframes. The longer the forecast range, the more uncertainties exist. As noted above, the FAA considers a 10-year timeframe for consistency review, and a 5-year timeframe beyond project implementation year for NEPA review purposes.[10]

The degree of uncertainty is also relevant when preparing design day flight schedules, or when forecasting flight schedule characteristics, such as how commercial passenger airlines or other airport operators may react to changes in airport operating conditions in the long term (see Section 4.4.1 of Appendix B.1). Accordingly, design day flight schedules (DDFS) prepared for the technical analyses are representative of anticipated future activity levels at LAX, as documented in Section 1.1 of Appendix B.2 of the Draft EIR. The discussion appropriately acknowledges that the DDFSs were developed based on results of the forecast analysis and, "therefore, includ[e] similar uncertainties associated with predicting operational and scheduling characteristics, or future aircraft fleets."

In spite of these uncertainties, the aviation forecast presented in Appendix B of the Draft EIR is based on the best available evidence, documented facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts. This is consistent with CEQA, which "does not require technical perfection in an EIR, but rather adequacy, completeness, and a good-faith effort at full disclosure." (CEQA Guidelines, § 15003, subd. (i); see also, *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 515 ["We also affirm that in reviewing an EIR's discussion, we do not require technical perfection or scientific certainty...."].) This is also consistent with the FAA's forecast review guidance: "When reviewing a sponsor's forecast, FAA must ensure that the forecast is based on reasonable planning assumptions, uses current data, and is developed using appropriate forecast methods."[11] As noted above, following its review, the FAA approved the LAX Airfield and Terminal Modernization Project forecasts in September 2020, as documented in Appendix B of the Draft EIR. Thus, both LAWA's aviation experts and the FAA agree that the Draft EIR's aviation forecast is valid despite the uncertainties inherent in any forecasting exercise.

Factors Influencing Airlines' Schedules and Passenger Demand

In response to comments suggesting that the proposed Project would result in increased aviation and/or passenger activity levels or capacity at LAX, it is important to recognize the vast body of empirical data that demonstrates the lack of a statistically significant correlation between improved airport facilities and increased passenger activity levels. Section 2.2 of Appendix B.1 provides a discussion of factors affecting aviation demand, including economic activity, geopolitical considerations, and the cost of aviation fuel. In addition, other factors exist that influence how airlines develop flight schedules to respond to passenger demand, as further documented below.

The decision by passengers to choose to fly to, from, or through LAX is driven by many factors. In its guidance for developing local aviation forecasts, the FAA discusses the following factors affecting aviation activity: socioeconomic data, demographics, disposable income, geographic attributes, and external

[10] Note that the FAA may review airport sponsors' forecasts beyond the timeframes discussed herein for long-term planning purposes, such as master plan analyses which would typically forecast aviation activity demand over a 20-year timeframe.

[11] U.S. Department of Transportation, Federal Aviation Administration, *Review and Approval of Aviation Forecasts*, June 2008, p.1. Available: https://www.faa.gov/airports/planning_capacity/media/approval_local_forecasts_2008.pdf.

factors such as fuel costs and airline industry-related factors (airline mergers, airline hubbing practices, and airfares).[12] In the context of having more than one airport from which to choose (in a multi-airport region such as the Los Angeles basin), as discussed in the Airport Cooperative Research Program (ACRP) Report 98, passengers will consider a series of elements in evaluating travel options: air service availability, price, itineraries, flight schedules, airport convenience, airline quality, airport quality, loyalty programs, airport ground access, airport previous experience, and aircraft type.[13] The Report proceeds to state that the purpose of the trip (leisure or business) is the "single largest determinant of airport choice"[14] Therefore, it is important to note that no one element on this long list can be identified as a major factor that would influence passenger choice to use LAX; instead, passenger choice is the result of a complex decision-making process.

ACRP Report 98 further analyzes how airlines make business decisions to meet passenger demand: "The demand for passenger air transportation is the driving force for business decisions in the airline industry. Passenger air travel demand is the sum of individual decisions by potential air travelers, aggregated to a level that provides sufficient revenue to support the sustainable and profitable provision of air service in a market. Passenger airlines seek to tailor their business models to both accommodate this demand and drive the resulting revenue."[15] ACRP Report 98 provides a list of factors that airlines consider when making business decisions: airline network conditions; alliances and partners; aircraft fleet; cabin configuration; pricing; revenue management; product distribution network; scheduling; and loyalty programs.[16] Therefore, as discussed in ACRP Report 98, airline decisions to schedule flights at LAX are the result of complex business models based upon sophisticated revenue, inventory, and pricing management systems.

For these reasons, LAWA's aviation experts do not expect the proposed Project to result in increased aviation and/or passenger activity levels or capacity at LAX. This expectation is also supported by the gating and airfield simulation analyses conducted for the proposed Project, which demonstrate that simulated flight schedules and airfield operations could be accommodated at LAX through at least 2033 by existing and planned terminal facilities *other than* the proposed Project. (See Section 4.3 of Appendix B.1 of the Draft EIR.) Further, the analysis demonstrates that the airfield at LAX would constrain the ability of LAX to accommodate the forecasted unconstrained demand with or without the proposed Project, resulting in an anticipated slowdown in aircraft operation growth by FY 2033. In other words, the proposed Project facilities are not a determinative factor in influencing demand or capacity at LAX.

Major Disruptive Historical Events and Associated Recovery at LAX

In evaluating comments asserting that the forecasts in the Draft EIR should be revised to account for the effect of the COVID-19 pandemic on passenger air travel, it is instructive to examine how other disruptive events have affected aviation demand and numbers of annual passengers and aircraft operations at LAX.

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12 U.S. Department of Transportation, Federal Aviation Administration, Advisory Circular 150/5070-6B, Change 2, *Airport Master Plans*, January 27, 2015, Chapter 7 Aviation Forecasts, pp. 37-38. Available: https://www.faa.gov/airports/resources/advisory_circulars/index.cfm/go/document.information/documentID/22329.

13 Transportation Research Board of the National Academies, Airport Cooperative Research Program, *ACRP Report 98, Understanding Airline and Passenger Choice in Multi-Airport Regions*, 2013, p. 12. Available: http://www.trb.org/Publications/Blurbs/170194.aspx.

14 Transportation Research Board of the National Academies, Airport Cooperative Research Program, *ACRP Report 98, Understanding Airline and Passenger Choice in Multi-Airport Regions*, 2013, p. 12. Available: http://www.trb.org/Publications/Blurbs/170194.aspx.

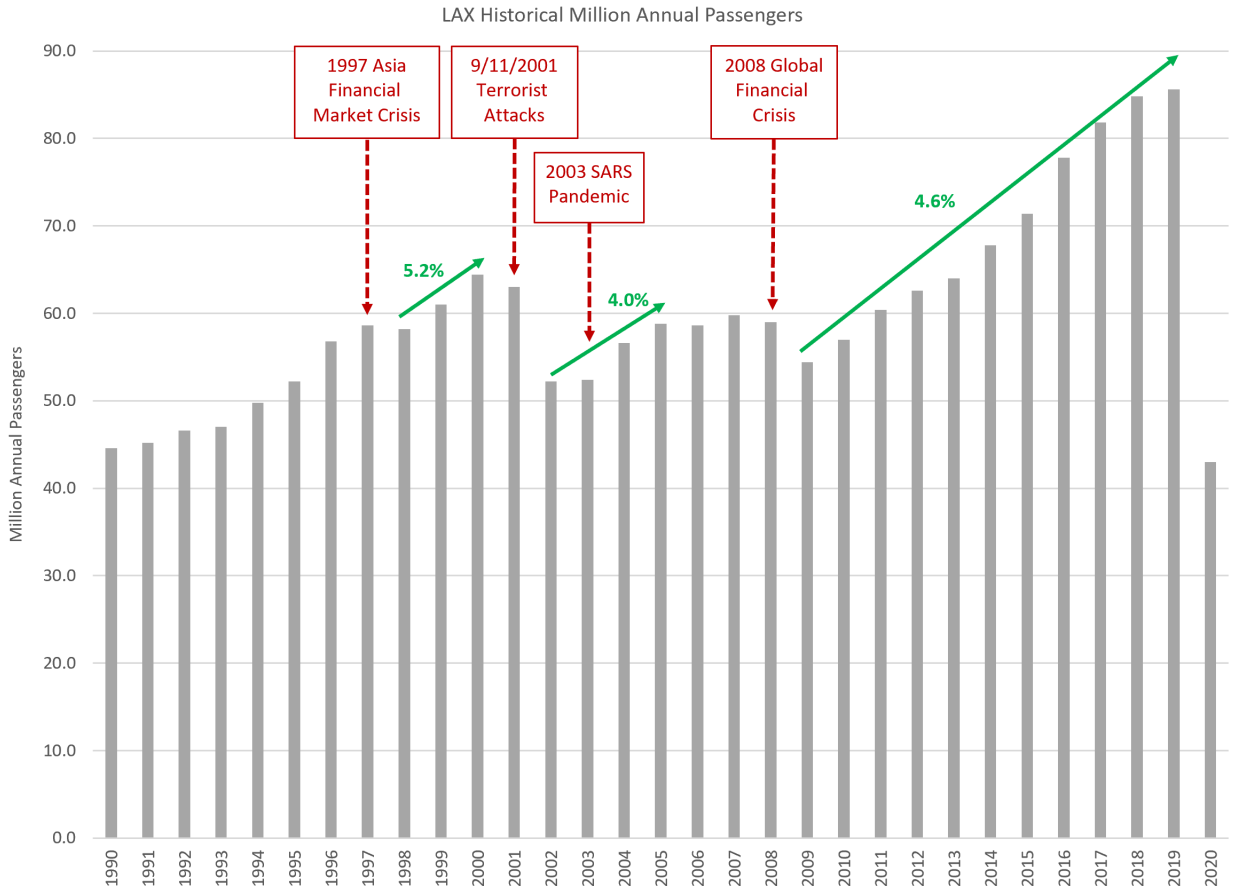
15 Transportation Research Board of the National Academies, Airport Cooperative Research Program, *ACRP Report 98, Understanding Airline and Passenger Choice in Multi-Airport Regions*, 2013, pp. 16-17. Available: http://www.trb.org/Publications/Blurbs/170194.aspx.

16 Transportation Research Board of the National Academies, Airport Cooperative Research Program, *ACRP Report 98, Understanding Airline and Passenger Choice in Multi-Airport Regions*, 2013, pp. 17-18. Available: http://www.trb.org/Publications/Blurbs/170194.aspx.

Figures 1 and **2**, below, depict the major disruptive historical and economic events affecting aviation demand since 1990, along with LAX historical numbers of annual passengers and aircraft operations.

The four major disruptive historical and economic events affecting aviation demand that have occurred since 1990, not including the current COVID-19 pandemic, are: the 1997 Asia financial market crisis; the September 11, 2001 terrorist attacks in the United States; the 2003 Severe Acute Respiratory Syndrome (SARS) pandemic; and the 2008 global financial crisis.

As depicted on Figure 1, historical data published by the FAA demonstrates that passenger demand at LAX rebounded after each historical event, at compounded annual growth rates (CAGR) of four percent and above. This provides evidence that the LAX market for aviation demand has been extremely resilient to previous disruptive events.



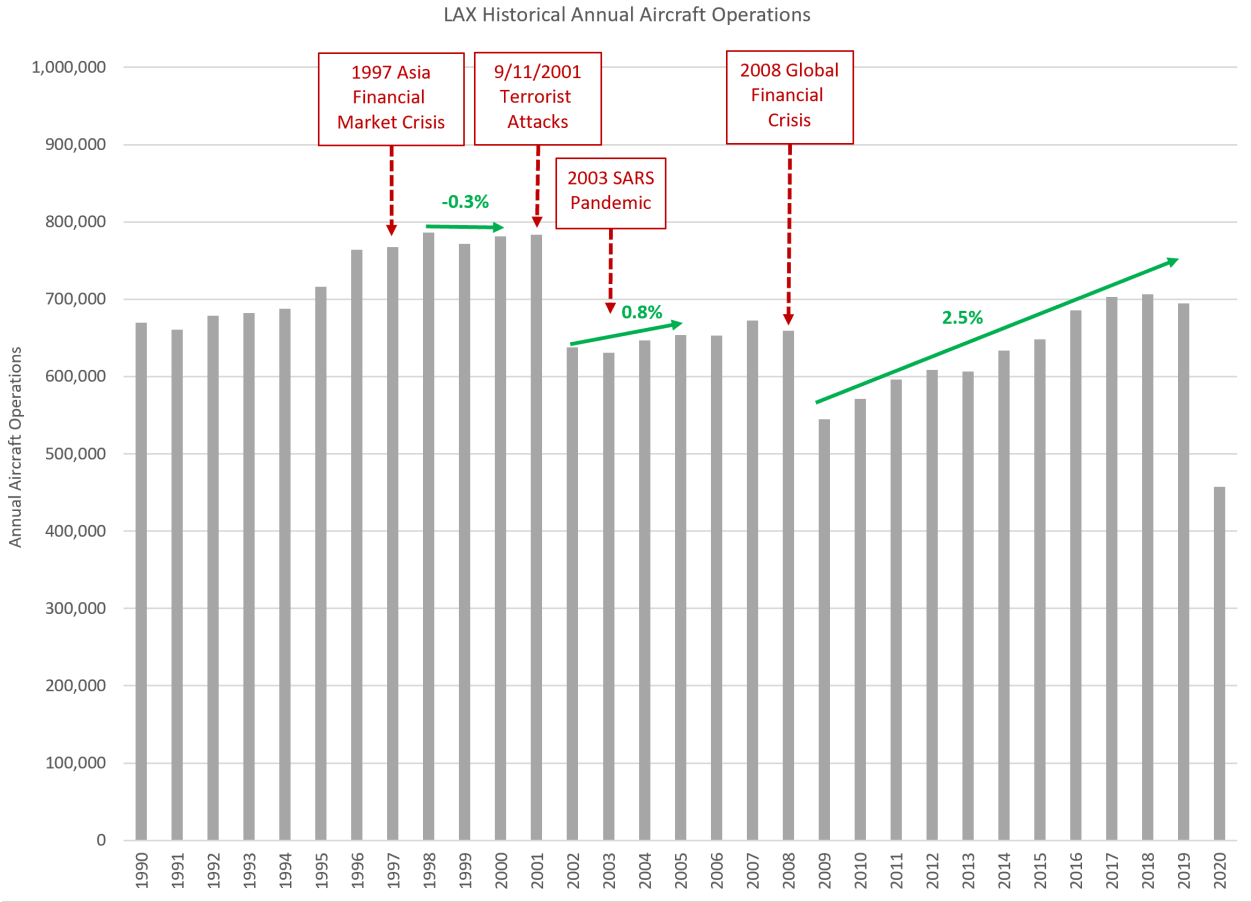
Source: Ricondo & Associates, Inc., May 2021, based on historical data published by the Federal Aviation Administration; available: https://taf.faa.gov/.

Figure 1: LAX Historical Million Annual Passengers (1990-2020)

Notably, the passenger rebounds depicted in Figure 1 did not correspond to a direct increase in the number of annual aircraft operations at LAX. That is because commercial passenger airlines have historically accommodated passenger demand by scheduling aircraft with higher seat capacity and higher load factors,[17] therefore requiring fewer aircraft operations. As depicted on Figure 2, between 1997 and 2001, the number of annual aircraft operations remained relatively flat. Less than one percent growth in

[17] Load factor is defined as the percentage of seats occupied by passengers on a flight.

aircraft operations was recorded between 2002 and 2005. Over the period of 2009 through 2019, the number of annual operations grew at a CAGR of 2.5 percent, which did not grow proportionally with the number of annual passengers. Note that data presented on Figure 2 also includes unscheduled operations (such as cargo and general aviation operations), which might have recovered at different rates than commercial passenger airline operations. However, as documented in Table 3-7 of Appendix B.1 of the Draft EIR, unscheduled operations have historically fluctuated between approximately 10 and 12 percent of all operations. Therefore, commercial passenger operations have dominated recovery trends depicted on Figure 2, which is consistent with forecast assumptions documented in Appendix B.1 of the Draft EIR.



Source: Ricondo & Associates, Inc., May 2021, based on historical data published by the Federal Aviation Administration; available: https://taf.faa.gov/.

Figure 2: LAX Historical Annual Aircraft Operations (1990-2020)

These figures provide empirical evidence of LAX's resiliency to recover from major disruptive historical and economic events within a few years. These figures also depict the fact that short-term variations in passenger activity levels have not impeded long-term growth in passenger demand at LAX. Finally, these figures also support the assumptions made by LAWA's aviation experts that commercial passenger airlines at LAX would use higher seat capacity and load factors to meet LAX's passenger demand, resulting in slower growth in aircraft operations (as discussed in Section 4.4 of Appendix B.1 regarding the anticipated operational changes under a constrained demand scenario).

Forecasted Passenger and Aircraft Operation Demand in the Light of the COVID-19 Global Pandemic

As documented in the preamble to Appendix B.1 of the Draft EIR, the aviation activity forecasts prepared for the LAX Airfield and Terminal Modernization Project were completed in October 2019, just a few months prior to the COVID-19 global pandemic emergence in early 2020. The Draft EIR was published in October 2020 during the COVID-19 global pandemic. The uncertainties documented in the Draft EIR related to the severity and duration of the contraction in aviation activity resulting from the COVID-19 global pandemic remain pertinent in mid-2021. While the United States has shown signs of recovery, other countries and economies in the world remain affected by widespread infections and slower vaccination rates.

According to monthly passenger activity data tracked by LAWA, passenger activity levels in June 2021 were up over 370 percent compared to those in June 2020 (i.e., 4,887,694 in June 2021 compared to 1,003,861 in June 2020.[18] Passenger levels in May 2021 were up over 700 percent compared to those of May 2020 (i.e., 4,054,092 in May 2021 compared to 575,756 in May 2020), and passenger activity levels also substantially improved in April 2021, up by over 1,000 percent, compared to April 2020 (i.e., 3,074,936 in April 2021 compared to 299,366 in April 2020).[19]

Nevertheless, as noted in the preamble in Appendix B.1 of the Draft EIR, the FAA stated that there is "no historical precedent" for aviation experts to consider and help understand how and when aviation activity will fully recover.

In a March 2021 advisory bulletin, the Airports Council International (ACI) emphasized that "much uncertainty still surrounds the recovery of the aviation industry, however, and projecting the path to recovery at this point is an exercise requiring prudence."[20] In this advisory bulletin, ACI estimates that under a baseline recovery scenario, global passenger demand is expected to recover to 2019 levels in 2024. Under this scenario, if LAX were to recover at the same rate of the global industry, the projected demand for passengers and aircraft operations documented in the Draft EIR would be delayed by 5 years (with LAX back at 2019 levels in 2024). Beyond that, LAX may rebound faster than projected, based on historical data documented above.

In May 2021, the FAA released the final TAF for 2020. In the accompanying report, the FAA noted: "There is uncertainty associated with the forecasts because of the uncertainty regarding the path of the [COVID-19] pandemic and its economic impacts. Particular attention was spent on forecasting the near term recovery back to 2019 activity."[21] The FAA estimates that LAX will recover to 2019 activity levels (for both passengers and aircraft operations) between 2025 and 2026.[22] Thus, according to the FAA, the projected demand for passengers and aircraft operations documented in the Draft EIR will be delayed by approximately 6 years (with LAX at 2019 levels in 2025). Beyond that, uncertainty remains, as discussed by the FAA.

It is therefore reasonable to conclude that the number of passengers and aircraft operations assumed and analyzed in the Draft EIR for 2028 are most likely higher than they will actually be in 2028, post-COVID-19

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18 City of Los Angeles, Los Angeles World Airports, *Traffic Comparison (TCOM) Los Angeles International Airport Calendar YTD January to June*, July 2021. Available: https://www.lawa.org/-/media/cf73d89fc22042ac91b9816db77a01b9.pdf

19 City of Los Angeles, Los Angeles World Airports, Val Y. Hunter, Chief Management Analyst, *2019 – 2021 LAX Passenger Total for Jan – May*, provided June 29, 2021.

20 Airports Council International, *The Impact of COVID-19 on the Airport Business and the Path to Recovery*, March 25, 2021. Available: https://aci.aero/news/2021/03/25/the-impact-of-covid-19-on-the-airport-business-and-the-path-to-recovery/.

21 U.S. Department of Transportation, Federal Aviation Administration, *Forecast Process for 2020 TAF*, May 2021, p. 2. Available: https://taf.faa.gov/Downloads/ForecastProcessfor2020TAF.pdf.

22 U.S. Department of Transportation, Federal Aviation Administration, 2020 Terminal Area Forecast database - LAX, May 2021. Available: https://taf.faa.gov/.

recovery. The Draft EIR evaluates and discloses the impacts of the proposed Project when it would be fully operational in the buildout year of 2028. As a result of the COVID-19 global pandemic, impacts analyzed in the Draft EIR are most likely commensurate to higher levels of activity than will actually occur in 2028. Thus, the Draft EIR's analysis of impacts related to passenger activity levels in 2028 can be considered conservative.

TR-ATMP-G-2: Midfield Satellite Concourse Gates and West Remote Gates

Introduction

Numerous comments received on the LAX Airfield and Terminal Modernization Project Draft EIR relate to the description and analysis of gates assumed in the Draft EIR. This topical response explains why the assumptions in the gating analysis prepared for the LAX Airfield and Terminal Modernization Project Draft EIR are accurate with respect to the Midfield Satellite Concourse (MSC) Program and the West Remote Gates (WRGs).

Midfield Satellite Concourse Program

The following discussion explains the relationship between the MSC Program and the proposed LAX Airfield and Terminal Modernization Project, the American Eagle Commuter gates, and the WRGs.

Overview

MSC Program and MSC North Project

On July 21, 2014, the Board of Airport Commissioners (BOAC) certified a Final EIR pursuant to CEQA for all phases of the LAX MSC Program[23] (Resolution 25478). The EIR was certified and adopted by the Los Angeles City Council on August 20, 2014. The MSC Program, as analyzed in the MSC EIR, consisted of a new multilevel concourse west of the Tom Bradley International Terminal with a total of 29 gates and a Central Terminal Processor. Due to the size and scale of the MSC Program and the immediate need to enable rehabilitation and modernization of existing facilities, LAWA decided to implement the program in phases. The 2014 MSC EIR contained a program-level analysis of the full MSC Program, including the planned southerly extension of the MSC, and a project-level analysis of what the EIR called the "MSC North Project." The 2014 MSC EIR therefore contemplated that (1) the environmental review process had been completed for the MSC North Project; and (2) further, project-level analysis of MSC South, or other elements of the MSC Program, would be performed before MSC South or other components of the MSC Program would be approved.

Section 2.5.2 of the 2014 MSC EIR assumed the MSC North Project would include up to 11 gates. Section 2.5.6.1 of the 2014 MSC EIR assumed that the future phase(s) of the approved MSC Program would extend the MSC building south in one or more phases, with up to 18 additional aircraft gates, for a total of 29 MSC gates. As stated in the 2014 MSC EIR, further project-level environmental review of these components would be required in the future before they could be implemented.

As part of the natural progression of the design process, plans for the MSC North Project were further refined. On November 17, 2016, BOAC approved modifications to the MSC North Project, including a reconfiguration of the concourse with the ability to provide 12 aircraft gates capable of accommodating ADG V and ADG VI aircraft. On July 18, 2019, BOAC approved incorporation of three additional Group III

[23] City of Los Angeles, Los Angeles World Airports, *Final Environmental Impact Report for Los Angeles International Airport (LAX) Midfield Satellite Concourse*, (SCH 2013021020), June 2014. Available: https://www.lawa.org/en/lawa-msc-north/project-documents.

aircraft gates at MSC North for a total of up to 15 gates. These 15 gates are reflected in Exhibit 2-2 of Appendix B of the Draft ATMP EIR, which reflects the assumed 2028 Passenger Gate Layout that will exist with or without the proposed Project.

Construction of the MSC North Project, renamed the "West Gates at Tom Bradley International Terminal," was completed in May 2021.[24]

Phase 2 of the MSC Program

On August 1, 2019, BOAC approved the next phase (i.e., Phase 2) of the MSC Program, commonly referred to as the MSC South project. Phase 2 consists of a southerly extension of the MSC, eight aircraft gates, and related improvements. Although Phase 2 will build a portion of the future phases of the MSC Program identified in the 2014 MSC EIR, it does not represent a full buildout of the future phases. This is consistent with the 2014 MSC EIR, which states, "[t]he future phase(s) of the MSC Program would extend the MSC building south in one or more phases" and that demolition of the American Airlines High Bay Hangar, which sits just west of the future MSC South building, would be required to allow for such future phase(s).

The eight approved MSC South gates are reflected in the "No Project" 2028 Passenger Gate Layout in Exhibit 2-2 of Appendix B.2 of the Draft ATMP EIR. As shown in that exhibit, together, the MSC North Project and the MSC South (Phase 2) project are expected to provide a total of 23 gates in 2028. This is six fewer gates than the 29 gates permitted under the 2014 MSC Program approval.

As required by CEQA, in connection with Phase 2 of the MSC Program, a project-level environmental analysis was performed in July 2019 to evaluate whether Phase 2 would have any environmental effects that were not examined in the 2014 MSC EIR in order to determine whether additional CEQA documentation was necessary, pursuant to Public Resources Code Section 21083 and Sections 15162 and 15168 of the State CEQA Guidelines.[25] The environmental analysis determined that construction of Phase 2 of the MSC Program did not require further review under CEQA as it did not include any changes to the MSC Program that would result in significant impacts not already disclosed in the 2014 MSC EIR.[26] On August 1, 2019, BOAC considered and awarded a contract for design services for Phase 2 of the MSC Program.[27]

No actions or proceedings challenging either BOAC's July 21, 2014 approval of the MSC Program or its August 1, 2019 decision were commenced within the applicable statute of limitations period; therefore, pursuant to Public Resources Code Section 21167.2, both actions, and their associated environmental analyses, are presumed valid.

When LAWA determines a need for future phases of the MSC Program, and when those facilities have been sufficiently planned to undergo environmental evaluation, a project-level environmental review will be undertaken in compliance with CEQA and the State CEQA Guidelines.

Relationship of the MSC Program to the LAX Airfield and Terminal Modernization Project

The City of El Segundo's comments on the LAX Airfield and Terminal Modernization Project Draft EIR allege that MSC Phase 2 has been "improperly segmented" from environmental review of the proposed Project.

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[24] City of Los Angeles, Los Angeles World Airport, *Mayor Garcetti, LAX Celebrate the Opening of $1.73 Billion State-of-the-Art West Gates at Tom Bradley International Terminal*, May 24, 2021. Available: https://www.lawa.org/news-releases/2021/news-release-022.

[25] City of Los Angeles, Los Angeles World Airports, *Environmental Analysis: Phase 2 of the Midfield Satellite Concourse Program*, prepared by Ricondo in association with Connico, Inc., July 2019.

[26] City of Los Angeles, Los Angeles World Airports, *Final Environmental Impact Report for Los Angeles International Airport (LAX) Midfield Satellite Concourse*, (SCH 2013021020), June 2014. Available: https://www.lawa.org/en/lawa-msc-north/project-documents.

[27] City of Los Angeles, Los Angeles World Airports, *Report to the Board of Airport Commissioners Item 12 for August 1, 2019 Meeting*, August 2019. Available: https://lawa.granicus.com/MetaViewer.php?view_id=4&clip_id=547&meta_id=38558.

In connection with this comment, El Segundo incorporated by reference a letter it previously submitted to LAWA on MSC Phase 2 on December 23, 2019, approximately five months after the BOAC approved Phase 2. Although LAWA was not separately required by CEQA to respond to the letter on MSC Phase 2, LAWA has determined it is appropriate to respond to the allegations in that letter in the context of this Final EIR. The following two subsections of this topical response, in connection with the specific responses provided to the City's letters included in the Final EIR, address those comments.

El Segundo claimed that Phase 2 of the MSC Program is linked to the LAX Airfield and Terminal Modernization Project and that both should have been evaluated as a single project in the Draft EIR. However, the LAX Airfield and Terminal Modernization Project is not part of Phase 2 of the MSC Program, nor is Phase 2 of the MSC Program a part of the LAX Airfield and Terminal Modernization Project; Phase 2 of the MSC Program is a separate and independent project and was not "piecemealed" from the LAX Airfield and Terminal Modernization Project. As a preliminary matter, as described above, BOAC approved MSC Phase 2 in August 2019, and LAWA is moving forward with MSC Phase 2 regardless of whether the proposed LAX Airfield and Terminal Modernization Project is ultimately approved. Project design and construction documents are currently underway, pre-construction activities (such as geotechnical and other site investigations) have commenced, and construction of initial enabling projects has been authorized. LAWA is not required by CEQA or any other law to reconsider this approval, or to incorporate MSC Phase 2 for re-approval as part of a later proposal.

Even if LAWA were proposing the LAX Airfield and Terminal Modernization Project and Phase 2 of the MSC Program contemporaneously, CEQA would not require LAWA to analyze them together as a single project. That is because the LAX Airfield and Terminal Modernization Project and Phase 2 of the MSC Program have different fundamental purposes. Chapter 1 of the LAX Airfield and Terminal Modernization Project Draft EIR lists the objectives of that Project, which include airfield improvements (such as enhanced safety and operational management), terminal improvements (such as providing for new modern, spacious, and efficient terminal facilities), and roadway system improvements (such as helping separate and remove airport-related traffic from the local roadway system). In contrast, the MSC Program was designed to allow LAWA to modernize its existing facilities more effectively by providing operational and gate flexibility. Because the two projects are in different locations in the airport, the fundamental purposes of the projects are different, and each project could and would go forward without the other, CEQA does not require that they be analyzed as a single project. (See *Paulek v. Department of Water Resources* (2014) 231 Cal.App.4th 35, 47; *Banning Ranch Conservancy v. City of Newport Beach* (2012) 211 Cal.App.4th 1209, 1224-1227; *Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App.4th 70, 101.)

Nevertheless, although neither the MSC Program as a whole nor MSC Phase 2 are a part of the LAX Airfield and Terminal Modernization Project, the MSC Program is accounted for in the Draft EIR. Specifically, both MSC North – including the new concourse, up to 15 gates, and associated facilities – and MSC Phase 2 – including the addition of eight gates and related improvements – were included as part of the No Project Alternative (Alternative 1) described in Section 5.4.2.1 of the Draft EIR. This approach is appropriate. As noted above, the MSC North Project has been completed and is operational, and MSC Phase 2 is approved and construction is underway. As identified in Table 3-1 of the Draft EIR, construction of MSC Phase 2 is expected to be completed in 2024. These factors constitute evidence that Phase 2 of the MSC Program will be constructed regardless of whether or not the LAX Airfield and Terminal Modernization Project is implemented and that it is reasonably foreseeable that operations will commence before 2028.

In addition to being assumed as part of the No Project Alternative, the MSC North Project and Phase 2 of the MSC Program were included as part of the 2028 operations analysis in both the "No Project" and "With Project" scenarios described in Appendix B.2 of the Draft EIR and illustrated in Exhibit 2-2 of that appendix. Phase 2 of the MSC Program was also included in the list of projects considered for the cumulative impacts assessment in accordance with State CEQA Guidelines Section 15130(b). (The list of

cumulative projects is described in Table 3-1 of the LAX Airfield and Terminal Modernization Project Draft EIR, as updated in Chapter F3, *Corrections and Clarifications to the Draft EIR*, of this Final EIR.) Therefore, the environmental impacts of the LAX Airfield and Terminal Modernization Project, in conjunction with implementation of the MSC Program, including Phase 2 of the MSC Program, and other cumulative projects, were appropriately evaluated in the Draft EIR for the LAX Airfield and Terminal Modernization Project.

Relationship of the MSC Program to the American Eagle Commuter Gates

El Segundo also claimed that Phase 2 of the MSC Program should be considered an "enabling project" for the LAX Airfield and Terminal Modernization Project due to the planned relocation of the American Eagle commuter gates to the future MSC Phase 2 gates. However, the relocation of American Eagle commuter gates to the MSC is a separate project with independent utility. The relocation is consistent with the objectives identified in the 2014 MSC EIR, providing the flexibility and improvement to the passenger experience identified in that EIR's project objectives. The relocation is also consistent with LAWA's Strategic Plan and the goal of delivering exceptional facilities and guest services.[28] Consistent with this goal, the relocation represents an improvement to the American Eagle commuter gates amenities and would eliminate busing between the American Airlines gates in the CTA and the gates at the current American Eagle commuter facility. In addition, LAWA's 2018 lease with American Airlines acknowledges the airline's desire to consolidate operations (stating, "the Tenant wishes to consolidate its existing leasehold space at the Airport") and includes a provision requiring American Airlines to relocate its American Eagle operations once a new facility has been identified/completed ("If the Landlord provides Reasonably Equivalent Gates, the Tenant agrees to relocate to the Reasonably Equivalent Gates pursuant to the Agreed Schedule.").[29] The relocation of the American Eagle gates to the MSC accomplishes these objectives, and additionally capitalizes on the proximity between MSC and Terminal 4 where American Airlines' operations are primarily located. The relocation of American Eagle commuter gates to MSC Phase 2 gates will occur regardless of whether the LAX Airfield and Terminal Modernization Project is approved.

Relationship of the MSC Program to the West Remote Gates

With respect to comments that the Draft EIR's "No Project" assumptions should not have assumed simultaneous operation of 23 gates at MSC and the existing 18 WRGs, LAWA provides the following response.

In the absence of the LAX Airfield and Terminal Modernization Project, LAWA has not proposed to decommission the WRGs, and has not envisioned decommissioning the WRGs, until after completion of the entire MSC Program. In fact, the 2014 MSC EIR states that all of the WRGs would be decommissioned "[u]pon completion of the future phase(s) of the MSC Program," and further states that "[n]one of the West Remote Gates/Pads would be decommissioned until full build-out of the MSC."[30] As evaluated in the MSC EIR, the full MSC Program consists of a total of 29 gates and a Central Terminal Processor. As explained above, the MSC Program is not yet complete and future phase(s) may be proposed when LAWA determines they are needed. Therefore, it was reasonable and appropriate for the No Project scenario in the Draft EIR to assume 18 WRGs in 2028 for purposes of the gating analysis in Appendix B.

Further, because eight gates were approved as part of Phase 2 of the MSC Program and, in the absence of the proposed Project, the 18 WRGs will remain available within the planning horizon for the proposed

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28 City of Los Angeles, Los Angeles World Airports, *LAWA Strategic Plan, Presentation to LAWA Board of Airport Commissioners*, October 20, 2016. Available: http://lawa.granicus.com/MetaViewer.php?view_id=4&event_id=1164&meta_id=27664.

29 City of Los Angeles, Department of Airports (Landlord) and American Airlines, Inc. (Tenant), *Terminal Facilities Lease and License Agreement: Terminal 4 and Terminal 5 Los Angeles International Airport*, August 15, 2018 (excerpt).

30 City of Los Angeles, Los Angeles World Airports, *Final Environmental Impact Report for Los Angeles International Airport (LAX) Midfield Satellite Concourse*, (SCH 2013021020), Volume 4, page 2-24, June 2014. Available: https://www.lawa.org/en/lawa-msc-north/project-documents.

Project, the assumption to include up to 23 gates for the MSC (Phase 1 and Phase 2) and the 18 WRGs under the No Project scenario in 2028, as described in Table 2-1 of Appendix B.2 of the Draft EIR, is based on substantial evidence. Therefore, the gating analyses conducted for the Draft EIR (documented in Section 2 of Appendix B.2 of the Draft EIR) are correct.

West Remote Gates

The following discussion explains why comments claiming that the Draft EIR improperly "credited" removal of the WRGs to offset impacts from the LAX Airfield and Terminal Modernization Project are incorrect.

Overview

As described in Section 2.4.2.3 of the Draft EIR, with implementation of the proposed Project, 15 of the existing 18 WRGs would no longer be used for regularly-scheduled commercial flights. Three passenger gates at the WRGs would remain in use, as depicted on Exhibit 2-3 of Appendix B.2 of the Draft EIR and as described in Section 2.4.2.3 of the LAX Airfield and Terminal Modernization Project Draft EIR (see also Chapter F3, *Corrections and Clarifications to the Draft EIR*, for revisions to Draft EIR Section 2.4.2.3). The operational analysis in Appendix B.2 assumed that the three remaining WRGs would be in use under the proposed Project scenario in 2028. The analysis assumed that these three remaining gates would be used in the same fashion as they are used under the 'No Project" scenario, except that under the 'with Project' scenario, the number of WRGs would be reduced from 18 to three. Therefore, the Draft EIR appropriately analyzes future operations at the WRGs. As illustrated in Exhibit 2-3 of Appendix B.2 of the Draft EIR, gates 410, 412, and 414 at the WRGs would be retained with implementation of the proposed Project.

Decommissioning of the West Remote Gates

The decommissioning of 15 of the 18 WRGs as described in the LAX Airfield and Terminal Modernization Project Draft EIR represents an implementation of LAWA's long-standing plan to phase out the WRGs as expressed in the 2004 LAX Master Plan EIR and the 2014 MSC EIR. However, although the 2014 MSC EIR included a project objective of reducing reliance on the WRGs, the 2014 MSC EIR did not assume that the gates associated with the MSC Program would replace the WRGs. As described above, the 2014 MSC EIR states that all of the WRGs would be decommissioned "[u]pon completion of the future phase(s) of the MSC Program," and further states that "[n]one of the West Remote Gates/Pads would be decommissioned until full build-out of the MSC."[31] As also described above, the MSC Program is being implemented in phases. Phase 2 of the MSC Program does not represent completion of the MSC Program. LAWA is still committed to decommissioning all WRGs at full buildout of the MSC. However, since the 2014 MSC EIR analysis, the timing for removal and decommissioning of the WRGs has changed, and LAWA now has the ability to decommission or remove 15 of the 18 WRGs with the proposed Project. The decommissioning or removal of the 15 WRGs accurately reflects LAWA's current plans. The fact that these plans have been revised and updated over time does not indicate any flaw in LAWA's environmental analysis for the LAX Airfield and Terminal Modernization Project. The operational analysis in Appendix B.2 of the Draft EIR for the proposed Project did not rely on the operational analysis prepared for the MSC Program EIR and subsequent addenda. Instead, the Draft EIR's operational analysis assumed the proposed Project would replace 15 of the 18 WRGs.

The decommissioning of the WRGs as described in the LAX Airfield and Terminal Modernization Project Draft EIR is consistent with the 2014 MSC EIR project objective to reduce reliance on the WRGs. In fact, the LAX Airfield and Terminal Modernization Project would accelerate the reduction in reliance on the

[31] City of Los Angeles, Los Angeles World Airports, *Final Environmental Impact Report for Los Angeles International Airport (LAX) Midfield Satellite Concourse*, (SCH 2013021020), Volume 4, page 2-24, June 2014. Available: https://www.lawa.org/en/lawa-msc-north/project-documents.

WRGs. Specifically, the LAX Airfield and Terminal Modernization Project Draft EIR includes a project objective of "removal and replacement of most of the West Remote Gates" (Draft EIR Section 2.3.2.2) and specifically commits to removing and decommissioning 15 of the 18 WRGs and replacing them with the new gates associated with Concourse 0 and Terminal 9 (Draft EIR Section 2.4.2.3). This would occur prior to full build-out of the MSC Program.

Therefore, there is no basis for the claim that LAWA has "double-counted" the WRGs or improperly "credited" removal of the WRGs. LAWA has not relied upon removal or decommissioning of the WRGs as mitigation. All projections of gates following removal and decommissioning of WRGs have included all gates expected to exist at LAX at that future time without regard to which gates "replaced" the WRGs.

TR-ATMP-G-3: Analysis of Project Beyond Buildout Year of 2028

Introduction

The Draft EIR evaluates and discloses the impacts of the proposed Project when it would be fully operational in the buildout year of 2028. A number of comments on the Draft EIR assert that the impacts analysis should extend beyond the Project buildout year of 2028. Some comments claim that the impacts analysis horizon year should be 2045. This topical response explains why it was reasonable and appropriate for the Draft EIR to use the buildout year of 2028 as the horizon year for environmental analysis. This topical response also provides, for informational purposes, a general discussion of conditions in 2033 with and without the proposed Project.

CEQA Requirements

Section 15144 of the State CEQA Guidelines states: "*Drafting an EIR or preparing a Negative Declaration necessarily involves some degree of forecasting. While foreseeing the unforeseeable is not possible, an agency must use its best efforts to find out and disclose all that it reasonably can*." Section 15145 of the State CEQA Guidelines states: "*If, after thorough investigation, a Lead Agency finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact*."

CEQA does not establish a fixed rule or requirement concerning the time horizon to be used in performing an environmental analysis. The time horizon used for a plan often corresponds to the period during which build-out of the plan is anticipated. Similarly, the time horizon for an infrastructure project often focuses on the impacts that will occur when the project is completed and commences operations. For a multi-phase project, completion of the infrastructure may occur some years in the future. No one approach is required. The time horizon used to perform the analysis will necessarily vary depending on the nature of the project, and the timeframe within which the project is expected to become operational. The lead agency must, therefore, use its judgment to determine the appropriate time horizon to use for purposes of analysis. This issue is analogous to methodological issues concerning how to perform the analysis, such as which data to rely upon and which model or other analytic tool to use. "It is well established an agency has discretion in selecting the methodology to be used in evaluating environmental impact, subject to review for substantial evidence." (*South of Market Community Action Network v. City and County of San Francisco* (2019) 33 Cal.App.5th 321, 337.)

It Is Appropriate to Use 2028 as the Horizon Year for Impact Analysis

One of the proposed Project objectives is to "complete construction of the proposed Project prior to the 2028 Olympic and Paralympic Games to be held in Los Angeles." Thus, the Draft EIR assumes 2028 as the buildout year for the proposed Project.

The Draft EIR evaluates and discloses the impacts of the proposed Project when it is expected to be fully operational in the buildout year of 2028. As further described in Section 2.3.1.2.2 and Appendix B of the Draft EIR, changes in environmental conditions beyond that point would be primarily attributable to increases in activity levels (i.e., aircraft operations and passenger levels) that are projected to occur regardless of the proposed Project. Section 15064, subdivision (d) of the State CEQA Guidelines states: *"In evaluating the significance of the environmental effect of a project, the Lead Agency shall consider direct physical changes in the environment which may be caused by the project and reasonably foreseeable indirect physical changes in the environment which may be caused by the project*." Changes in environmental conditions beyond the 2028 buildout year, especially as compared to existing baseline conditions, do not represent the *environmental effect of a project* or changes in the environment *caused by the project*.

Additionally, as further explained in Topical Response TR-ATMP-G-1, there are already numerous uncertainties inherent in aviation forecasting. Pushing the forecast range out beyond the proposed Project buildout year increases these uncertainties, making the forecast less meaningful to the public and to decision-makers.

Some comments on the Draft EIR suggest that the impact analysis should have gone out to 2045, pointing to the fact that the LAX aviation activity forecasts developed for the proposed Project include future passenger levels out to a horizon year of 2045. As noted in Section 2.3.1.2 and Appendix B.1 of the Draft EIR, the activity forecasts prepared for the proposed Project extend to Fiscal Year (FY) 2045 to coincide with the horizon year of the Southern California Association of Governments' (SCAG) 2020 update to the Regional Transportation Plan/Sustainable Communities Strategies (RTP/SCS). The forecast horizon year of FY 2045 also coincides with the horizon year of the 2019 Terminal Area Forecast (TAF) prepared by the Federal Aviation Administration (FAA). However, the aviation activity levels projected in the Draft EIR for 2045 reflect only a growth trend analysis extrapolated out to 2045, consistent with the planning horizon year framework that SCAG uses for regional transportation planning throughout the southern California metropolitan area. Importantly, the RTP/SCS is a region-wide planning document prepared by SCAG, not a project-specific document. It should also be noted that even though the FAA TAF goes out to 2045, that long-term projection cannot be used for environmental analysis purposes, but rather the near-term (i.e., 5- to 10-year forecast data) is the focus for use in airport planning and environmental analysis purposes. As evidenced in the LAX Aviation Activity Forecast Approval letter from FAA to LAWA that is presented in Appendix B.1 of the Draft EIR, an aviation activity forecast to be used in an environmental review document cannot deviate from the most current FAA TAF by more than a set percentage. Specifically, any differences in the aviation activity levels in the project forecast compared to the most current FAA TAF must be less than 10 percent in the first five years of the forecast and less than 15 percent in the first 10 years of the forecast. That approach reflects the fact that there is increasing uncertainty and likelihood of change as one goes farther out into the future.

Additionally, the 2045 horizon year in the RTP/SCS is federally mandated; SCAG is required by federal law to prepare and update a long-range RTP (23 U.S.C. §134 et seq.), which must include a 20-year forecast period. Further, SCAG's regional transportation planning forecast is updated and revised every four years, reflecting the fact that it is not intended to identify with certainty conditions in 2045. In fact, the Program EIR prepared for the 2020-2045 RTP/SCS acknowledges that "[t]he long-range planning horizon of more than 20 years necessitates that many of the projects included in the Plan (and the alternatives) are identified at the conceptual level... Not all impacts can be feasibly and/or accurately quantitatively analyzed at a regional level and/or up to the year 2045."[32] Thus, the fact that SCAG RTP/SCS has a horizon

[32] Southern California Association of Governments, *Connect SoCal: The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments*, adopted September 3, 2020. Page 1.0-9. Available: https://scag.ca.gov/sites/main/files/file-attachments/dpeir_connectsocal_1_introduction.pdf?1606002563.

year of 2045 does not have any bearing on the project-specific impacts analysis for the LAX Airfield and Terminal Modernization Project.

Moreover, the fact that the Draft EIR includes a projected general activity level for LAX in 2045 does not make the environmental impacts of the proposed Project "reasonably foreseeable." It would be speculative to estimate environmental impacts of the proposed Project some 25 years out (i.e., 17 years beyond when full operation of the Project would occur [2028]). CEQA does not require this kind of speculation.

One commenter cited examples of EIRs for other projects in which the impacts analyses were based on a 20-year planning projection, including, specifically, the EIR for the San Jose International Airport Master Plan and the EIRs for two Port of Los Angeles cargo container terminal improvements projects. As further detailed in Response to Comment ATMP-AL010-215, the impacts analysis horizon year for each of those projects corresponded to the year when proposed improvements would be completed or the year that the facility lease was being extended to. As such, the horizon year assumed in each of those EIRs for evaluating operational impacts was not based on planning projections but rather reflects the completion timeframe for each project. In all of these EIRs, the impacts analyses did not extend any further into the future beyond the horizon year that was established based on the project completion or other end date. In addition, the fact that other EIRs used different horizon years does not mean that the horizon year for the proposed Project was improper. EIRs for different projects invariably use different horizon years. Indeed, as noted above, there is no set rule regarding what the horizon year ought to be; rather, the lead agency has discretion to determine the appropriate timeframe upon which to base its analysis, taking into account the characteristics of the proposed project.

Using an operational impacts analysis year for the LAX Airfield and Terminal Modernization Project that corresponds with the definition of the proposed Project (i.e., the year that the proposed Project would be fully operational) is consistent with the approach used in all of the example EIRs cited by commenters.

One commenter had several comments alleging that implementation of the proposed Project would relieve capacity constraints and would induce additional growth at LAX beyond 2028; for this reason, the commenter stated that the Draft EIR should have included technical analysis of impacts beyond 2028 including out to 2045. Such allegations are presented in comments ATMP-AL010-31 through ATMP-AL010-46. As indicated in the responses to those comments, the scope and timeframe (i.e., buildout horizon year) of the impacts analysis presented in the Draft EIR is appropriate for the proposed Project, consistent with CEQA requirements and as supported with technical analyses documented by LAWA's aviation experts. The commenter provides only its opinion and unsupported speculation on what the technical analysis results would have shown if analyses beyond 2028 were conducted, and the reasons why analyses beyond 2028 is warranted.

In summary, LAWA has determined, based on substantial evidence, that analysis of the proposed Project's impacts beyond the 2028 buildout year is not required. However, as discussed in greater detail in Topical Response TR-ATPM-G-1, as a result of the COVID-19 pandemic, impacts analyzed in the Draft EIR are most likely commensurate to higher levels of activity than will actually occur in 2028. This means that, in essence, the impacts the Draft EIR analyzes related to passenger activity levels in 2028 would actually occur after the 2028 buildout date, subject to unpredictable fluctuations in passenger demand.

General Discussion of Post-Buildout Environmental Conditions

Although not required under CEQA, LAWA completed an evaluation of operations-related environmental conditions in 2033 -- five years beyond the proposed Project completion year of 2028. This evaluation is based on data and analysis contained in the Draft Environmental Assessment (EA) for the LAX Airfield and Terminal Modernization Project prepared in accordance with the requirements of the National

Environmental Policy Act (NEPA), with the FAA serving as the Lead Agency. The Draft EA was published in May 2021 (available at https://www.lawa.org/atmp/documents). At the direction of the FAA, the Draft EA evaluates potential impacts at Project buildout (2028) and at Project buildout plus five years (2033). Because this information was readily available, LAWA decided to include it in the Final EIR for informational purposes. It is important to note that, similar to the Draft EIR, the Draft EA's evaluation was conducted using the aviation activity forecast prepared for the Draft EIR and, thus, does not reflect the impacts of the COVID-19 pandemic on aviation activity. As discussed in Topical Response TR-ATMP-G-1, the FAA released in May 2021 the final TAF for 2020. In the accompanying report, the FAA noted: "There is uncertainty associated with the forecasts because of the uncertainty regarding the path of the [COVID-19] pandemic and its economic impacts. Particular attention was spent on forecasting the near term recovery back to 2019 activity."[33] The FAA estimates that LAX will recover to 2019 activity levels (for both passengers and aircraft operations) between 2025 and 2026.[34] Thus, according to the FAA, the projected demand for passengers and aircraft operations documented in the Draft EIR will be delayed by approximately 6 years (with LAX at 2019 levels in 2025). Therefore, the conditions discussed below for 2033 may not actually occur until some years later. In essence, it is possible that the impacts projected to occur in 2028, as addressed in the Draft EIR and in the Draft EA, might not actually occur until a later horizon year (e.g., 2033). As discussed above, predicting impacts that far out involves speculation. Therefore, LAWA does not guarantee that the impacts discussed below would occur exactly as described. Nevertheless, LAWA provides this evaluation for informational purposes in response to the comments received on the Draft EIR.

As noted earlier, changes in operational conditions at LAX beyond the proposed Project buildout year will be primarily attributable to future increases in aircraft operations and passenger levels that are projected to occur regardless of the proposed Project. This evaluation compares environmental conditions in 2033 with implementation of the proposed Project (i.e., the With Project scenario) to the environmental conditions that would exist without the proposed Project (i.e., the Without Project scenario). Specifically, the evaluation considers whether the proposed Project improvements, which would be operational in 2033, would result in a change in future environmental conditions compared to what would otherwise occur without the proposed Project, while taking into account future growth in activity levels that will occur under both scenarios. Comparing environmental conditions in 2033 with implementation of the proposed Project – such as air pollutant emissions from aircraft, motor vehicles, and other sources, or greenhouse gases (GHG) emissions, or aircraft and roadway traffic noise, or traffic related to vehicle miles traveled (VMT) – to those identified in the Draft EIR for 2028 or 2018 baseline conditions would not be indicative of impacts caused by the proposed Project. This is because, in most cases, increases in impacts occurring in 2033, compared to 2028, would not be a result of the proposed Project, but rather a result of changes in the environmental setting in which the impacts occur. In particular, aviation activity levels at LAX, in terms of annual aircraft operations and numbers of passengers, would be greater in 2033 than in 2028 due to passenger demand levels that are expected to occur independent of the proposed Project. As such, the background airport-related emissions of air pollutants, GHG, and noise that contribute to the environmental setting in which the Project-related improvements would operate would be greater in 2033 than in 2028, but not as a result of the proposed Project. Comparing those airport-related environmental characteristics in 2033 to a 2018 environmental baseline would not be representative of Project-related impacts, nor would a comparison between 2033 and 2028 be an indicator of Project-related impacts. The more meaningful analysis, for informational purposes, would be a comparison between 2033 with the proposed Project and 2033 without the proposed Project. In other words, the

[33] U.S. Department of Transportation, Federal Aviation Administration, *Forecast Process for 2020 TAF*, May 2021, p. 2. Available: https://taf.faa.gov/Downloads/ForecastProcessfor2020TAF.pdf.

[34] U.S. Department of Transportation, Federal Aviation Administration, 2020 Terminal Area Forecast database - LAX, May 2021. Available: https://taf.faa.gov/.

analysis focuses on how the Project-related improvements would affect airport operations in 2033 compared to what would otherwise occur without the improvements. For example, the analysis considers whether the amount of time and distance that aircraft taxi between gates and runways would be greater or less with the Project-related improvements (i.e., the proposed airfield improvements and the new concourse and terminal), which would increase or decrease aircraft emissions, than what would otherwise occur from aircraft taxiing without the Project-related improvements. Although the number of annual aircraft operations in 2033 would be more than that of 2028 and consequently the amount of airport-related pollutant emissions in 2033 would be greater than in 2028, that increase in the number of annual aircraft operations and associated emissions is completely independent of the proposed Project. The more pertinent issue is whether the operational characteristics of those aircraft in 2033 would be different with the Project than without the Project, and, if so, whether there be a meaningful difference in the associated air pollutant emissions.

The comparison of operations-related environmental conditions projected to occur in 2033 is provided below, using, as a guide where appropriate, the 2028 With Project scenario versus Without Project scenario comparisons that are presented in Chapter 4 of the Draft EIR (i.e., for environmental topics where the impacts significance determination was based on a comparison of 2028 With Project to 2018 baseline conditions, the Draft EIR also provides, for informational purposes, a comparison of 2028 With Project to 2028 Without Project, as was the case relative to air quality, human health risk, greenhouse gas emissions, and aircraft noise). As proposed Project construction would be completed by 2028, the evaluation only addresses those environmental resource areas that would be affected by airport operations in 2033. Certain impact categories (e.g., historic resources, hazardous materials, and construction noise) would only have construction-related impacts, which would be complete by 2028 and, therefore, these topics are not discussed. Additionally, impacts related to energy consumption, water demand, and wastewater generation are based on building square footages, which would not change after 2028. These topics, therefore, are also not discussed below. Construction-related impacts pertaining to air quality, human health risk, and GHG emissions would not occur in 2033, and are therefore not discussed below; however, operations-related impacts for those topics would occur in 2033 and are included in the analysis below.

Air Quality

Emissions

Table 1 and **Table 2** below provide a comparison of the LAX operational emissions in 2033 and in 2028, respectively, for the Without Project and With Project scenarios.

Table 1
2033 Operational Emissions Inventory

	Emission Source[1]	Emissions in Tons Per Year					
		CO	VOC	NO_X	SO_X	PM_{10}	$PM_{2.5}$
2033 - Without Project	Aircraft & APU	5,798	615	6,206	536	61	61
	GSE	355	4	30	1	1	1
	Traffic & Parking	2,242	63	257	9	514	155
	Total[2]	**8,396**	**682**	**6,493**	**545**	**576**	**217**
2033 - With Project	Aircraft & APU	5,795	622	6,189	533	58	58
	GSE	355	4	30	1	1	1
	Traffic & Parking	2,268	64	259	9	522	158
	Total[2]	**8,418**	**690**	**6,478**	**542**	**581**	**216**
% Change Associated with Project	Aircraft & APU	-0.05%	1.14%	-0.27%	-0.56%	-4.92%	-4.92%
	GSE	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	Traffic & Parking	1.16%	1.59%	0.78%	0.00%	1.56%	1.94%
	Total[2]	**0.26%**	**1.17%**	**-0.23%**	**-0.55%**	**0.87%**	**-0.46%**

Source: City of Los Angeles, Los Angeles World Airports, *LAX Airfield and Terminal Modernization Project Draft Environmental Assessment*, Table 4.1-4 and Table 4.1-6, May 2021. Available: https://www.lawa.org/atmp/documents.

Notes:
1 Stationary source emissions are not included in this table as they are minor, being one ton per year or less.
2 Totals may not add due to rounding.

Key:
APU – auxiliary power unit
CO – carbon monoxide
$PM_{2.5}$ – fine particulate matter
GSE – ground support equipment
NO_x – nitrogen oxides
SO_x – sulfur oxides
tpy – tons per year
PM_{10} – respirable particulate matter

Table 2
2028 Operational Emissions Inventory

	Emission Source[1]	Emissions in Tons Per Year					
		CO	VOC	NOX	SOX	PM10	PM2.5
2028 - Without Project	Aircraft & APU	5,586	602	5,518	489	53	53
	GSE	730	8	69	1	1	1
	Traffic & Parking	2,354	67	281	9	481	146
	Total[2]	**8,670**	**678**	**5,868**	**498**	**535**	**200**
2028 - With Project	Aircraft & APU	5,594	607	5,513	488	52	52
	GSE	730	8	69	1	1	1
	Traffic & Parking	2,385	67	283	9	490	149
	Total[2]	**8,709**	**682**	**5,865**	**497**	**543**	**202**
% Change Associated with Project	Aircraft & APU	0.14%	0.83%	-0.09%	-0.20%	-1.89%	-1.89%
	GSE	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	Traffic & Parking	1.32%	0.00%	0.71%	0.00%	1.87%	2.05%
	Total[2]	**0.45%**	**0.59%**	**-0.05%**	**-0.20%**	**1.50%**	**1.00%**

Source: City of Los Angeles, Los Angeles World Airports, *LAX Airfield and Terminal Modernization Project Draft Environmental Assessment*, Table 4.1-4 and Table 4.1-5, May 2021. Available: https://www.lawa.org/atmp/documents.

Notes:

[1] Stationary source emissions are not included in this table as they are minor, being one ton per year or less.

[2] Totals may not add due to rounding.

Key:

APU – auxiliary power unit
CO – carbon monoxide
$PM_{2.5}$ – fine particulate matter
GSE – ground support equipment
NO_x – nitrogen oxides
SO_x – sulfur oxides
tpy – tons per year
PM_{10} – respirable particulate matter

In terms of emissions in 2033 compared to those disclosed in Draft EIR for 2028, the total emissions in 2033 would be greater than those in 2028 due to growth in airport activity projected to occur during that period independent of the proposed Project. In particular, increased aircraft operations would be the main contributor to the increase emissions. Emissions from ground support equipment (GSE) and traffic/parking would be less in 2033 than in 2028 based on LAWA's continued implementation of the LAX GSE Emission Reduction Policy (see Section 4.1.1.3.1.4 of the Draft EIR) and ongoing reductions in motor vehicle emissions in the future, based on federal and state regulations. In both 2033 and 2028, the total operational emissions With Project would be generally similar to those Without Project, with the differences being 1.5 percent or less. It should be noted that, with the exception of volatile organic compounds (VOC), the relative increases in total emissions in 2033 for the With Project scenario compared to the Without Project scenario would be less than what would occur in 2028 (the percentage increases in carbon monoxide (CO), respirable particulate matter (PM_{10}), and fine particulate matter ($PM_{2.5}$) in 2033 would be 0.26, 0.87, and -0.46 compared to 0.45, 1.50, and 1.00 in 2028). Similarly, the relative decreases in total emissions in 2033 With Project compared to Without Project would be more than what would occur in 2028 (the percentage decreases in nitrogen oxides [NO_x] and sulfur oxides (SO_x) in 2033 would be -0.23 and -0.55 compared to -0.05 and -0.20 in 2028). As such, in evaluating how the environmental impacts in 2033 would compare to those in 2028 with implementation of the proposed Project and what would be the comparative differences between the two horizon years relative to Project-related impacts, it can be concluded that there is not an appreciable difference in impacts between the two years, although the air quality benefits associated with implementing the proposed Project would be slightly greater in 2033 than in 2028.

Concentrations

The Draft EA for the LAX Airfield and Terminal Modernization Project does not include a comparison of air pollutant emissions with the proposed Project and without the proposed Project. That is because the basis of impact evaluation pursuant to NEPA is whether LAX operational emissions with implementation of the proposed Project would exceed applicable ambient air quality standards. Based on air quality modeling data currently available for the proposed Project, it is not possible to quantify the differences, if any, in air pollutant concentrations for With Project compared to Without Project in 2033 or 2028. Given that air pollutant concentrations are determined primarily by the volumes of the respective pollutants, as dispersed by wind conditions and other meteorological and physical setting conditions, one can consider the above-described differences in emissions inventories for With Project and Without Project conditions to provide a general indication of how concentrations might differ between the two scenarios. As indicated above, there are no appreciable differences in total emissions between With Project and Without Project for 2033 or 2028. Another key consideration related to concentrations for With Project compared to Without Project conditions is whether there are notable changes in where the sources of emissions are located. The only notable Project-related changes in where emissions sources occur at LAX would be: the eastward relocation of aircraft gates, specifically, the removal/decommissioning of 15 gates at the West Remote Gates in the western portion of the airport and the development of new/replacement gates at Concourse 0 and Terminal 9 in the eastern portion of the airport; and, the development of new roadways near the eastern portion of the airport (i.e., the proposed Airfield and Terminal Modernization Project roadway system). Regarding the roadway system, it should be noted that the addition of new roadways near the eastern portion of the airport is only relevant to 2028, where such roads would be developed under the With Project scenario, but would not occur under the Without Project scenario. In 2033, however, the Without Project scenario would include the development of the LAX Landside Access Modernization Program Phase 2 roadway improvements which, similar to With Project, would place new roads near the eastern portion of the airport. While such Project-related shifts in the locations of emissions sources could result in the occurrence of peak pollutant concentrations in locations different from what would otherwise occur under the Without Project scenario, the levels of concentrations is not expected to be substantially different between With Project and Without Project in either 2028 or 2033, given that the differences in the respective emissions inventories is only about 1.5 percent or less.

Human Health Risk

The Draft EA for the LAX Airfield and Terminal Modernization Project does not address human health risk, as that is not a requirement of the FAA for NEPA analyses. As such, there is no data or analyses currently available relative to 2033 conditions. The Draft EIR addresses potential human health risks in 2028 relative to cancer risks, chronic non-cancer health hazards, and acute non-cancer health hazards. Comparisons between the Without Project scenario and the With Project scenario for the three types of risks/health hazards in 2028 are provided in the tables below (**Table 3** through **Table 5**).

Table 3
Incremental Cancer Risks for Maximally Exposed Individuals for 2028 Without Project Operations Compared to 2018 Baseline and 2028 With Project Compared to 2018 Baseline

Receptor Type	Incremental Cancer Risks (per million people)	
	2028 Without Project Operations Compared to 2018 Baseline	2028 With Project Operations Compared to 2018 Baseline
Off-Airport Worker, 25 years	-0.2	5
Adult Resident, 70 years	-4	-4
Adult Resident, 30 years	-3	-4
Child Resident, 9 years	-2	-3
School Child, 12 years	-0.9	-1

Source: City of Los Angeles, Los Angeles World Airports, *LAX Airfield and Terminal Modernization Project Draft Environmental Impact Report*, Table 4.1.2-4, October 2020. Available: https://www.lawa.org/atmp/documents.

Table 4
Incremental Chronic Non-Cancer Human Health Hazards for Maximally Exposed Individuals for 2028 Without Project Operations Compared to 2018 Baseline and 2028 With Project Compared to 2018 Baseline

Receptor Type	Incremental Hazards			
	2028 Without Project Operations Compared to 2018 Baseline		2028 With Project Operations Compared to 2018 Baseline	
	Resident HI	Worker HI	Resident HI	Worker HI
First Year of Operations, 2028	-0.006	0.01	0.02	0.09

Source: City of Los Angeles, Los Angeles World Airports, *LAX Airfield and Terminal Modernization Project Draft Environmental Impact Report*, Table 4.1.2-6, October 2020. Available: https://www.lawa.org/atmp/documents.

Table 5
Operation-Related Incremental Acute (1-Hour) Non-Cancer Health Hazards for 2028 Without Project Compared to 2018 Baseline and 2028 With Project Compared to 2018 Baseline

MEI (Operation)	Acrolein HQ	Benzene HQ	Formaldehyde HQ	Manganese HQ	Nickel HQ	Total HI
2028 Without Project Compared to 2018 Baseline						
Off-Airport Adult Worker	0.2	0.009	0.04	0.03	0.01	0.3
Resident	0.3	0.0007	0.03	0.01	0.004	0.4
2028 With Project Compared to 2018 Baseline						
Off-Airport Adult Worker	0.4	0.02	0.07	0.04	0.01	0.6
Resident	0.2	0.009	0.04	0.02	0.005	0.3

Source: City of Los Angeles, Los Angeles World Airports, *LAX Airfield and Terminal Modernization Project Draft Environmental Impact Report*, Table 4.1.2-9, October 2020. Available: https://www.lawa.org/atmp/documents.

Key:
MEI - maximally exposed individual HQ – hazard quotient HI – hazard index

The analyses results presented in the tables indicate risks for all receptors under both scenarios (i.e., With Project and Without Project) would all be well below the thresholds of significance, including for cancer (i.e., incremental cancer risk no greater than 10 in one million), chronic non-cancer health hazards (i.e., incremental health index no greater 1), and acute non-cancer health hazards (i.e., incremental health index no greater 1). For the most part, the risk levels are similar between With Project and Without Project scenarios in 2028, with the most notable difference being the incremental cancer risk for the nearest off-airport worker, which is estimated to be 5 With Project and -0.2 Without Project (see Table 3). That cancer risk is influenced primarily by the diesel particulate matter (DPM) emissions associated with ground support equipment (GSE) at Concourse 0 and Terminal 9 that would be located at the edges of the airport boundary, which would not otherwise occur under the Without Project scenario.

Regardless of the proposed Project, the number of aircraft operations in 2033 will be greater than the number of operations in 2028, and the number of GSE operations will also increase in proportion to increased aircraft operations (i.e., each gated aircraft has GSE support; as the number of gated aircraft operations increase in the future, so would also the accompanying GSE support operations). Given that the incremental cancer risk associated with LAX operations is driven primarily by DPM emissions from GSE and the incremental cancer risk calculated for 2028 is 5, the number of aircraft operations and accompanying GSE operations would essentially need to double in order for the risk level to exceed the threshold of significance of 10. As indicated in Table 4-1 of Appendix B-1 of the Draft EIR, annual aircraft operations in 2033 would be 824,500, which is only a three percent increase over the 800,000 annual aircraft operations in 2028 (notwithstanding the fact that the increased aircraft operations in 2033 would occur regardless of whether the proposed Project was implemented). Moreover, the DPM emission factors for 2033 are substantially lower than those in 2028, which reflects the ongoing implementation of LAX's GSE Emissions Policy (see Section 2.4.5 of the Draft EIR), with the daily emissions of DPM from GSE being 7.99 pounds in 2028 and 3.56 pounds in 2033. The increase in aircraft operations and corresponding increase in GSE operations would therefore be offset by the decrease in DPM emission factors for GSE operations. Based on the above, the cancer risk for 2033 under the With Project scenario would likely be less than that estimated for 2028 under the With Project scenario.

Greenhouse Gases Emissions

The types of differences in GHG emissions in 2033 under the With Project scenario compared to the Without Project scenario would be similar in nature to those described above for air quality pollutant emissions (i.e., generally around one percent or less). As indicated in **Table 6** below, aircraft-related GHG emissions in 2033 are anticipated to be slightly less for With Project versus Without Project, whereas stationary source and vehicle-related emissions would be greater With Project than Without Project. Such is also the case for 2028 With Project versus Without Project, although the percentage of aircraft-related GHG reductions for With Project versus Without Project would be greater in 2033 than in 2028 (i.e., 0.4 and 6.1 percent less in 2033 compared to 0.1 and 2.6 percent less in 2028). Overall, the difference in total GHG emissions for With Project versus Without Project would be less than one percent for both 2033 and 2028.

Table 6
Operational GHG Emissions for 2028 With Project as Compared to 2028 Without Project

Year	Emission Source	Without Project ($MTCO_2e$/yr)	With Project ($MTCO_2e$/yr)	Incremental Emissions ($MTCO_2e$/yr)	Percent Change
2033	Aircraft	1,250,054	1,244,923	(5,131)	(0.4)
	APUs	60,891	57,184	(3,707)	(6.1)
	GSE	9,947	9,947	0	0.0
	Stationary	97,397	107,490	10,093	10.4
	Autos	794,277	804,806	10,529	1.3
	Parking	26,344	26,819	475	1.8
	Total[1]	**2,238,910**	**2,251,169**	**12,259**	**0.5**
2028	Aircraft	1,143,999	1,142,950	(1,048)	(0.1)
	APUs	50,253	48,941	(1,312)	(2.6)
	GSE	19,626	19,626	0	0.0
	Stationary	97,397	107,490	10,093	10.4
	Autos	849,057	860,226	11,169	1.3
	Parking	26,494	27,003	54	0.2
	Total[1]	**2,186,825**	**2,206,236**	**19,411**	**0.9**

Source: City of Los Angeles, Los Angeles World Airports, *LAX Airfield and Terminal Modernization Project Draft Environmental Assessment*, Table 4.2-2, May 2021. Available: https://www.lawa.org/atmp/documents.

Notes:
Parentheses indicate negative values.
[1] Numbers may not add due to rounding.

Key:
GHG – greenhouse gas
APU – auxiliary power unit
$MTCO_2e$/yr – metric tons carbon dioxide equivalent per year
GSE – ground support equipment

Noise

Similar to 2028, there would be no difference in aircraft noise impacts in 2033 between the With Project and Without Project scenarios because aircraft operations, including aircraft arrivals and departures, would be the same regardless of the proposed Project. **Table 7** through **Table 9** below provide the relevant comparisons for aircraft noise impacts. Similarly, because both the With Project scenario and the Without Project scenario in 2033 would have the same future passenger activity levels and associated vehicle trips, and the trip distribution onto local roadways would be generally similar, it is not anticipated that there would be substantial differences in roadway traffic noise impacts in 2033 for the With Project scenario versus the Without Project scenario.[35] This is especially true given that the LAX Landside Access Modernization Program Phase 2 roadways would be in the same general areas as the roadway system proposed by the Project. As further explained in Response to Comment ATMP-AL010-13, the roadway system proposed as part of the LAX Airfield and Terminal Modernization Project is similar to the roadway system that would otherwise be constructed as part of Phase 2 of the approved LAX Landside Access

[35] Although the Draft EA for the LAX Airfield and Terminal Modernization Project includes a roadway noise analysis for 2028 and 2033, the noise metric used in characterizing and measuring roadway noise in that analysis is peak hour L_{eq} (i.e., equivalent continuous level during peak hour traffic), which is fundamentally different from CNEL (i.e., weighted noise level over a 24-hour period with noise penalties applied to noise during evening and nighttime hours), which was used to measure and evaluate roadway noise impacts in the Draft EIR. As such, the roadway noise data in the Draft EA is not suitable for estimating how roadway noise impacts disclosed in the Draft EIR for 2028 may differ in 2033.

Modernization Program. Under the Without Project scenario, it is anticipated that all of the LAX Landside Access Modernization Program roadway system improvements would be in place by 2033; therefore, the roadway system carrying airport-related traffic would be similar between With Project and Without Project and roadway noise levels along those roadways would also be similar for both scenarios in 2033.

Table 7
Estimated Population and Housing Unit Counts within the Aircraft Noise Contours

	Population[1]				Housing[1]			
	65-70 CNEL	70-75 CNEL	>75 CNEL	Total	65-70 CNEL	70-75 CNEL	>75 CNEL	Total
2033 Conditions								
Without Project	62,673	20,947	1,407	85,027	23,209	6,083	485	29,777
With Project	62,673	20,947	1,407	85,027	23,209	6,083	485	29,777
Difference Between Without Project and With Project	0	0	0	0	0	0	0	0
2028 Conditions								
Without Project	61,311	19,596	1,183	82,090	22,651	5,660	413	28,724
With Project	61,311	19,596	1,183	82,090	22,651	5,660	413	28,724
Difference Between Without Project and With Project	0	0	0	0	0	0	0	0

Source: City of Los Angeles, Los Angeles World Airports, *LAX Airfield and Terminal Modernization Project Draft Environmental Assessment*, Table 4.8-2, May 2021. Available: https://www.lawa.org/atmp/documents.

Note:
[1] 2010 U.S. Census Block Data.

Key:
CNEL – Community Noise Equivalent Level

Table 8
2033 Estimated Noise-Sensitive Sites within the Aircraft Noise Contours (Non-Residential)

		65-70 dBA CNEL	70-75 dBA CNEL	75+ dBA CNEL	Total
Houses of Worship	Without Project	24	2	0	
	With Project	24	2	0	
Schools	Without Project	32	9	0	
	With Project	32	9	0	
Libraries	Without Project	3	1	0	
	With Project	3	1	0	
Hospitals	Without Project	0	0	0	
	With Project	0	0	0	
Colleges	Without Project	2	1	0	
	With Project	2	1	0	
Historic Properties	Without Project	1	0	1	
	With Project	1	0	1	
	Total Without Project	62	13	1	76
	Total With Project	62	13	1	76

Source: City of Los Angeles, Los Angeles World Airports, *LAX Airfield and Terminal Modernization Project Draft Environmental Assessment*, Table 4.8-4, May 2021. Available: https://www.lawa.org/atmp/documents.

Key:
CNEL – Community Noise Equivalent Level
dBA – A-weighted decibel

Table 9
2028 Estimated Noise-Sensitive Sites within the Aircraft Noise Contours (Non-Residential)

		65-70 dBA CNEL	70-75 dBA CNEL	75+ dBA CNEL	Total
Houses of Worship	Without Project	24	1	0	
	With Project	24	1	0	
Schools	Without Project	25	4	0	
	With Project	25	4	0	
Libraries	Without Project	3	0	0	
	With Project	3	0	0	
Hospitals	Without Project	0	0	0	
	With Project	0	0	0	
Colleges	Without Project	1	1	0	
	With Project	1	1	0	
Historic Properties	Without Project	1	0	1	
	With Project	1	0	1	
	Total Without Project	54	6	1	61
	Total With Project	54	6	1	61

Source: City of Los Angeles, Los Angeles World Airports, *LAX Airfield and Terminal Modernization Project Draft Environmental Assessment*, Table 4.8-3, May 2021. Available: https://www.lawa.org/atmp/documents.

Key:
CNEL – Community Noise Equivalent Level
dBA – A-weighted decibel

Transportation – Vehicle Miles Traveled

The Draft EA for the LAX Airfield and Terminal Modernization Project does not address Vehicle Miles Traveled (VMT), because NEPA does not require such an analysis; therefore, there are no VMT data in the Draft EA for With Project and Without Project in 2033 or 2028. The following discussion of VMT in 2033 is derived from information presented in Section 4.8 of the Draft EIR.

Passenger VMT

The Draft EIR measured passenger VMT impacts in terms of total passenger VMT in 2028 with the proposed Project compared to the 2028 Projected Future Conditions Baseline. VMT is based on number of trips multiplied times the length of each trip. Given that the number of trips would be the same for both scenarios (i.e., both assume 110.8 MAP), the passenger VMT impacts would be due primarily to the additional 5.8 lane miles that would occur under the With Project scenario in 2028 compared to the Without Project scenario (i.e., with the additional lane miles associated with the proposed Project's roadway system, the trip length for passengers traveling to and from the Central Terminal Area (CTA) would be longer than what would otherwise occur without those new roadways).

In 2033, the number of vehicle trips for the With Project scenario would also be the same as the Without Project scenario; however, unlike 2028, the increased trip distance for the With Project scenario as compared to the Without Project scenario would only be 1.8 miles. (As noted above, development of the LAX Landside Access Modernization Program Phase 2 roadway improvements that would occur in 2033 for the Without Project scenario would result in 4 additional lane miles; therefore, the difference between the Without Project scenario and the With Project scenario in 2033 would be 5.8 lane miles less 4.0 lane miles, or 1.8 lane miles.) The threshold of significance for passenger VMT impacts is based on whether the With Project conditions would result in an increase in total passenger VMT over the Projected Future Conditions Baseline (i.e., any net increase in total passenger VMT would be significant). Based on the above, the 1.8 additional lane miles that would occur in 2033 for With Project conditions compared to Without Project conditions would result in an increase in total passenger VMT, which would be a significant impact. Importantly, however, that impact in 2033 would not represent a substantial increase in the severity of the significant impact on passenger VMT identified in the Draft EIR for 2028 conditions. Instead, the opposite would be true; the significant passenger VMT impact in 2033, which would be attributable to the 1.8 additional lane miles, would be less severe than the significant passenger VMT impact in 2028 which would be attributable to the 5.8 additional lane miles. That is because in this instance passenger VMT is largely a function of the increase in lane miles attributable to the proposed Project, and in 2033 the proposed Project would result in a smaller increase in lane miles as compared to the increase in lane miles in 2028. Similar to 2028 conditions, mitigation would be required for the significant passenger VMT impact in 2033, and the potential VMT reduction strategies presented in Mitigation Measure MM-T (ATMP)-1 (see Section 4.8.5.2.2 of the Draft EIR) would still apply in 2033. Also similar to 2028 conditions, the passenger VMT impact in 2033 would be significant and unavoidable, even with mitigation; however, the severity of the significant impact in 2033 would be less than that of 2028.

Employment VMT

For the Draft EIR, the Project-related employment VMT analysis assumed 4,700 new long-term employees associated with Concourse 0 and Terminal 9. That employment projection was based on building square footage and, therefore, would not change for the 2033 analysis. The assumptions regarding non-Project employment for 2028 were based on an average annual growth factor, which are assumed to apply equally to 2033. The average commute distance was assumed to be the same for all employees at LAX, which are also assumed to apply in 2033. As discussed in Section 4.8.5.2.1 of the Draft EIR, VMT per employee under the With Project scenario in 2028 would be more efficient than under the existing 2019 conditions baseline and would be decreased compared to the Without Project scenario in 2028 due to

planned improvements to transit and improvements associated with Phase 1 of the LAX Landside Access Modernization Program, as well as changes to employee parking destinations. Because the Draft EIR's analysis of VMT is based on VMT per employee, and the 4,700 new employees associated with the proposed Project would be reached at buildout in 2028 and not increase beyond that (i.e., the maximum number of new employees associated with Concourse 0 and Terminal 9 is based on the estimated maximum floor area at buildout, including the 20 percent contingency addition to the floor area, which would not be any greater in 2033), it is anticipated that there would be no difference in the VMT per employee for the With Project and Without Project scenarios in 2033 that was estimated in the Draft EIR for 2028. As such, there would still be a significant employment VMT impact in 2033, but there would not be an increase in the severity of that impact in 2033 compared to 2028. With regard to mitigation of the significant employment VMT impact in 2033, the VMT reduction strategies identified in Section 4.8.5.2.2 of the Draft EIR for employment VMT impacts (i.e., Mitigation Measure MM-T (ATMP)-1) would still apply, and the level of employment VMT reduction needed to reduce the impact to less than significant (i.e., 16,450 daily VMT) would be the same in 2033 as in 2028. As indicated in Section 4.8.5.3.3 of the Draft EIR, implementation of the proposed VMT reduction strategies would reduce the impact to less than significant.

Induced VMT

As described in Section 4.8.5.4 of the Draft EIR, development of the proposed roadway system improvements would help divert airport-related traffic off of Sepulveda Boulevard which, in turn, is anticipated to result in additional new VMT (i.e., "induced VMT") in 2028. The ability of the proposed Project's roadway improvements to divert airport-related traffic off of Sepulveda Boulevard would still exist in 2033; however, the Projected Future Conditions Baseline (i.e., the Without Project conditions) that serves as the basis of comparison would be different in 2033 than in 2028. As previously noted above in the discussion of Noise impacts, and as further explained in Response to Comment ATMP-AL010-13, the roadway system proposed as part of the LAX Airfield and Terminal Modernization Project is similar to the roadway system that would otherwise be construction as part of the approved LAX Landside Access Modernization Program. Under the Without Project scenario for 2033 baseline conditions, it is anticipated that all of the LAX Landside Access Modernization Program roadway system improvements would be in place by 2033, which would not be the case in 2028. As such, it is anticipated that there would be some amount of airport-related traffic diversion off of Sepulveda Boulevard in 2033 under the Without Project conditions, which, in turn, would result in some amount of induced VMT. Given the general similarity of the LAX Airfield and Terminal Modernization Project roadway system and the LAX Landside Access Modernization Program roadway system, it is anticipated that operation of the proposed Project in 2033 would result in a substantial increase in the amount of airport-related traffic that would be diverted off of Sepulveda Boulevard, and associated induced VMT, than would otherwise occur under the Without Project scenario in 2033. Given that the threshold of significance for induced VMT impacts is essentially no net increase in VMT, any comparatively better traffic diversion in 2033 attributable to the proposed Project's roadway system could result in a net increase in (induced) VMT, which would be a significant impact. Similar to the passenger VMT impact described above, that impact in 2033 would not represent an increase in the severity of the significant induced VMT impact in 2028, but rather would be a less severe significant impact. Notwithstanding, there are no feasible mitigation measures for induced VMT impacts, as explained in Section 4.8.5.4.3 of the Draft EIR; hence, the induced VMT impact would be significant and unavoidable in 2033, as would also be the case in 2028.

Summary

The Draft EIR provides an appropriate analysis of operational impacts at Project completion in 2028, which provides accurate and meaningful information to the public and decision-makers. This methodological approach is supported by substantial evidence and is consistent with the approach taken in most EIRs

that, like the Draft EIR, analyze a specific project. CEQA does not require analysis of operational impacts beyond the Project buildout year. Pushing the analysis out beyond the proposed Project buildout year increases the uncertainties inherent in aviation forecasting, making the forecast and the analysis less meaningful to the public and to decision-makers. Nevertheless, in response to comments received, LAWA prepared a general discussion of operations-related environmental conditions in 2033 for informational purposes. None of the information presented in this evaluation rises to the level of "new significant information" as defined in Section 15088.5 of the State CEQA Guidelines as it does not identify a new substantial adverse environmental effect of the proposed Project or a substantial increase in the severity of an environmental impact that cannot be reduced below the level of significance with mitigation.

TR-ATMP-AQ/GHG-1: Mitigation of Project-Related Air Quality and Greenhouse Gas Impacts

Introduction

Several comments suggested additional or more stringent mitigation measures to reduce Project-related significant air quality and greenhouse gas (GHG) impacts. As explained below, the Draft EIR analyzed a variety of potential mitigation measures, project design features, and existing programs at LAX with respect to their ability to reduce significant air quality and GHG impacts. Nearly 100 potentially applicable measures, presented in Appendix C.9 of the Draft EIR, were analyzed during the formulation of the air quality and GHG mitigation program proposed for the Project. Several of the measures evaluated were not considered as mitigation because they were already being implemented at LAX under existing LAWA programs and requirements, and/or would already be incorporated into the proposed Project as Project features. Several other potential measures were evaluated and determined to be either infeasible or not applicable to the proposed Project. The remaining measures were incorporated as mitigation for either air quality impacts, GHG impacts, or both. However, not every identified measure would result in directly attributable or quantifiable reductions for significant air quality or GHG impacts, nor would every analyzed measure result in effective mitigation of significant Project-related impacts.

As noted above, several comments suggested additional mitigation measures for air quality and GHG impacts. **Table 1** below evaluates each of the suggested measures. Preceding that evaluation of the measures is a discussion of how mitigation is defined and treated under CEQA; a description of the existing programs, policies, and initiatives related to air quality and GHG emissions at LAX; and a summary of the significant air quality and GHG impacts identified in the Draft EIR for the proposed Project.

Mitigation Under CEQA

Public Resources Code, Section 21002, states that "…public agencies should not approve projects as proposed if there are feasible alternatives or ***feasible*** mitigation measures available which would ***substantially lessen*** the ***significant environmental effects*** of such projects…" and provides that "in the event specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof" (emphasis added). Further, Public Resources Code, Section 21061.1 defines "feasible" as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors." Section 15364 of the State CEQA Guidelines adds "legal… factors" to the definition of "feasible."

All potentially applicable mitigation measures which could substantially lessen the significant air quality and/or GHG impacts of the proposed Project were evaluated in the Draft EIR. Table C.9.1 of Appendix C.9 of the Draft EIR presents each potential measure identified at the time of publication of the Draft EIR. Some potential measures were determined to be infeasible or not applicable to the Project due to a variety of economic, social, or safety considerations. Other measures were found to be applicable and feasible but were already accounted for as Project features or as implemented features of existing programs, policies, or initiatives at LAX. Any measure determined to be applicable, feasible, and not already accounted for in existing programs, policies, or initiatives, or as a Project feature, was included in the Draft EIR as mitigation to reduce significant environmental air quality and/or GHG impacts of the proposed Project.

Existing Programs, Policies, and Initiatives

The existing LAWA programs and policies identified in Table C.9.1 of Appendix C.9 of the Draft EIR represent the most stringent application of each emissions reduction measure determined to be feasible at LAX. Existing programs are comprehensive plans and strategies to achieve the desired emissions reductions and sustainability measures at LAX, developed in close coordination with several relevant airport stakeholders including airlines, ground support providers, ground access operators, other local and regional transportation organizations, among others. In 2019, LAWA developed an airport-wide Sustainability Action Plan (SAP) and negotiated with airport stakeholders and the South Coast Air Quality Management District (SCAQMD) a Memorandum of Understanding (MOU) to work towards the reduction of airport-related emissions.[36,37] Throughout the process of developing the SAP and MOU, LAWA re-evaluated each of the existing programs and policies at the airport and developed additional policies in an Air Quality Improvement Measures plan.[38] This process determined, with input from relevant stakeholders, the maximum feasible extent to which these policies could be enhanced or made more stringent while still being achievable within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors. This process resulted in a substantial update to the LAX Ground Support Equipment (GSE) Program (updated in November 2019) and LAWA's Design and Construction Handbook (DCH) (updated in June 2020 to reflect the Air Quality Improvement Measures plan and the SAP).[39,40,41]

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36 City of Los Angeles, Los Angeles World Airports, *Sustainability Action Plan*, 2019. Available: https://cloud1lawa.app.box.com/s/63i2teszgnld5aws68xbou6yc0inl5rp.

37 City of Los Angeles / South Coast Air Quality Management District, Los Angeles World Airports, *Memorandum of Understanding between the South Coast Air Quality Management District and the City of Los Angeles Department of Airports*. December 2019. Available: http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/facility-based-mobile-source-measures/mou-la-department-of-airports.pdf.

38 City of Los Angeles, Los Angeles World Airports, *Air Quality Improvements Measures - LAWA'S Voluntary Air Quality Improvement Measures & Initiatives – Draft*, September 2019. Available: http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/facility-based-mobile-source-measures/draft-aqim.pdf.

39 City of Los Angeles, Los Angeles World Airports, *Ground Support Equipment Emissions Policy*, October 22, 2019. Available: https://www.lawa.org/-/media/lawa-web/environment/files/lax_gse_emission_reduction_policy_boac.ashx.

40 City of Los Angeles, Los Angeles World Airports, *LAX Electric Ground Support Equipment Incentive Program*, August 2019. Available: https://www.lawa.org/-/media/lawa-web/environment/files/gse-emissions-reduction-program/lax-funding-opportunity-announcement-and-application-preparation-package.ashx.

41 City of Los Angeles, Los Angeles World Airports, *Zero & Near-Zero Emission Heavy-Duty Vehicle Incentive Program*, January 17, 2019. Available: https://www.lawa.org/-/media/lawa-web/environment/files/zero-and-near-zero-emission-heavy-duty-vehicle-incentive-program-application.ashx.

Significant Air Quality and GHG Environmental Effects

The Draft EIR identified the following significant air quality and GHG impacts:

- Emissions of carbon monoxide (CO), volatile organic compounds (VOC), nitrogen oxides (NO_X), and sulfur oxides (SO_X) during construction (Impact 4.1.1-1 of the Draft EIR)
- Emissions of NO_X, SO_X, and respirable particulate matter (PM_{10}) during operation (Impact 4.1.1-2 of the Draft EIR)[42]
- Local concentrations resulting from the emission of PM_{10} during operation (Impact 4.1.1-4 of the Draft EIR)
- Emissions of GHGs during construction and subsequent operation (Impact 4.4-1 of the Draft EIR)
- Consistency with applicable plans, policies, or regulations adopted for the purpose of reducing the emissions of GHGs (Impact 4.4-2 of the Draft EIR)

Additional Air Quality and GHG Mitigation Measures Suggested in Comments on the Draft EIR

Section 15088 of the State CEQA Guidelines governs the evaluation and response to comments. Subdivision (c) of Section 15088 states that when a commenter suggests revisions to a proposed project to mitigate anticipated impacts and the lead agency does not accept the suggestion, the response must explain why the suggestion was not accepted, with good faith reasoned analysis and at a level of detail corresponding to the level of detail in the suggestion. Based on these requirements, an evaluation of each of the new or more stringent air quality and/or GHG mitigation measures suggested in comments on the Draft EIR is presented in Table 1 below.

[42] As noted in Chapter F3, *Corrections and Clarifications to the Draft EIR*, Section 4.1.1 of the Draft EIR has been revised to reflect that emissions of fine particulate matter ($PM_{2.5}$) from operation of the proposed Project would not be significant.

Table 1
TR-ATMP-AQ/GHG-1-1. Evaluation of New or More Stringent Recommended Air Quality and/or Greenhouse Gas Mitigation Measures Suggested in Comments on the Draft EIR

Comment ID	Suggested New or More Stringent Measure	Evaluation
ATMP-AL007-13	LAWA should strive to develop pioneering and far-reaching emissions reductions programs and policies that complement its global renown. LAWA should employ a strategy that encompasses the operations and impacts of all facilities, tenants, partners, and visitors at LAX. For instance, requiring increased usage of alternative aviation fuel would reduce the impacts of the proposed Project at and around LAX and at the many destinations to and from which the aircraft travel. LAWA should work with the FAA and airlines to require and memorialize such mitigation measures in the DEIR.	This suggested measure pertains to GHG emissions associated with airport-wide operations, including "all facilities, tenants, partners, and visitors at LAX." Addressing airport-wide operations is beyond the scope of the proposed Project. However, it should be noted that, in 2019, LAWA adopted the Sustainability Action Plan (SAP), a comprehensive strategy for addressing energy use and GHG emissions from airport sources. Also in 2019, LAWA signed a Memorandum of Understanding (MOU) in partnership with the SCAQMD for the control and reduction of LAWA-controlled emissions of criteria air pollutants at LAX. These actions, in addition to LAWA's various ongoing emission reduction programs and policies, such as the LAX Ground Support Equipment (GSE) Policy and Alternative Fuels Program, reflect an organizational commitment and strategy, similar to that of the San Pedro Bay Clean Air Action Plan, for the control and reduction of criteria pollutants and GHGs by LAWA. Furthermore, in 2017, LAX achieved Level 3 accreditation under the Airports Council International (ACI) Airport Carbon Accreditation (ACA) program and has maintained this accreditation ever since. To maintain Level 3 accreditation under this program, LAWA develops annual airport-wide GHG emission inventories and actively engages with third parties at the airport to demonstrate independently verifiable, three-year rolling average emission reductions for all direct and many indirect airport-related GHG emissions. For these reasons, the suggested measure will not be included as mitigation for the proposed Project.
ATMP-AL010-159	LAWA has demonstrated the feasibility of solar energy technology by committing to install four megawatts as part of the LAMP; it should commit to installing an equal or greater amount of solar in connection with the proposed Project.	LAWA is already in the process of assessing the feasibility of an on-site energy generation and storage system. A preliminary solar feasibility study was conducted at LAX which indicated the potential capacity for up to 23.5 megawatts (MW). LAWA is committed to continuing to explore ways to feasibly implement this technology in a cost-effective manner. However, until a project-level assessment is completed and approved, it is infeasible to commit to specific targets as part of the proposed Project. For these reasons, the suggested measure will not be included as mitigation for the proposed Project.
ATMP-AL010-164	LAWA shall provide El Segundo annually a copy of the emissions inventory LAWA provides annually to SCAQMD. LAWA shall consult with El Segundo and include it as a stakeholder should LAWA and/or SCAQMD propose any new, upgraded and/or additional air quality monitors within El Segundo's municipal boundaries.	State CEQA Guidelines Section 15126.4, subdivision (a)(1) requires the EIR to "describe feasible measures which could minimize significant adverse impacts." Consultation with El Segundo would not lessen the significant air quality or GHG environmental effects of the proposed Project and the recommended measure cannot be considered mitigation under CEQA. An inventory of emissions annually provided by LAWA to SCAQMD is a public document, and therefore available to El Segundo for its review. For these reasons, the suggested measure will not be included as mitigation for the proposed Project.

Table 1
TR-ATMP-AQ/GHG-1-1. Evaluation of New or More Stringent Recommended Air Quality and/or Greenhouse Gas Mitigation Measures Suggested in Comments on the Draft EIR

Comment ID	Suggested New or More Stringent Measure	Evaluation
ATMP-AL010-165	LAWA shall produce and publish on its website an annual "snapshot" report/map showing the current location of all aircraft gates and parking places in existence at LAX and whether they are currently equipped with ground power and/or pre-conditioned air. As part of this inventory, LAWA shall identify all existing LAX passenger gates (contact and remote), remain all day ("RAD") parking places, remain overnight ("RON") parking places, cargo aircraft loading positions, and maintenance positions and clearly disclose whether each location has or does not have ground power and/or preconditioned air. LAWA shall commit to installing ground power to all parking positions that do not yet have such upgrades and LAWA shall identify the schedule for when such power will be installed. LAWA shall commit to including preconditioned air at all gates and RON/RAD parking positions, particularly if aircraft using those positions would otherwise need to run their APUs to stay cool/get ready for passengers.	All existing passenger contact gates at LAX are equipped with ground power and pre-conditioned air (PCA). LAWA received FAA Voluntary Airport Low Emissions (VALE) grant funding to install ground power at aircraft positions, including RAD/RON positions, at the West Remote Gates. This project was completed in 2019. The LAX Design and Construction Handbook (DCH)[1] requires all new aircraft parking positions to be installed with ground power and PCA, where applicable. In accordance with this requirement, as identified in Table 2-3 of the Draft EIR, Concourse 0 and Terminal 9 would have electrified gates, which would include PCA. In LAWA's 2019 SAP, LAWA established a timeline for complete outfitting of outstanding cargo, maintenance, and hangar positions with ground power and/or PCA as applicable.[2] Currently, hangar positions and more than half of cargo positions have been outfitted with ground power, with the goal of outfitting the remainder by 2025. As stated in the SAP, LAWA's goal is to have all remaining RON/RAD positions outfitted with ground power by 2031. With respect to the suggestion that LAWA annually disclose progress towards these goals, this suggestion would not lessen the significant air quality or GHG environmental effects of the proposed Project and the recommended measure cannot be considered mitigation under CEQA. Because all gates at Concourse 0 and Terminal 9 would have electrified gates and PCA, the proposal to disclose annually the status of these gates is unnecessary. For these reasons, the suggested measure will not be included as mitigation for the proposed Project.
ATMP-AL010-192	Both MM-GHG (ATMP)-2 (Organic Waste Collection and Diversion) and MM-GHG (ATMP)-4 (Enhanced Recycling) must be significantly strengthened in order to achieve emission reductions.	As discussed in LAWA's SAP, LAWA is currently developing a Zero Waste Plan. The SAP also outlines goals to achieve a 25 percent non-construction waste diversion rate by 2025 and a 50 percent rate by 2035. Additionally, LAWA has a goal to achieve a 90 percent construction waste diversion rate by 2025 and a 95 percent rate by 2035. Because LAWA is actively working towards adopting a Zero Waste Plan, which may include source reduction, expanded recycling, and organic waste reduction components, the suggested revision to the mitigation measures included in the Draft EIR is not required. Additionally, see Response to Comment ATMP-AL010-191 for discussions of the adequacy of MM-GHG (ATMP)-2 and MM-GHG (ATMP)-4. For these reasons, the suggested measure will not be included as mitigation for the proposed Project.

Table 1
TR-ATMP-AQ/GHG-1-1. Evaluation of New or More Stringent Recommended Air Quality and/or Greenhouse Gas Mitigation Measures Suggested in Comments on the Draft EIR

Comment ID	Suggested New or More Stringent Measure	Evaluation
ATMP-PC035-86	Transition all baggage tugs, belt loaders, lifts, pushback tractors, and utility carts at [LAX] that are owned and operated by airlines and their ground handling contractors to service aircraft, shall be transitioned to alternative fuels (i.e., electric, natural gas, renewable diesel, biodiesel).	LAWA does not own or operate baggage tugs, belt loaders, lifts, pushback tractors, or other similar GSE at LAX, but, through the GSE Emissions Policy,[3] LAWA does impose requirements on airlines and GSE operators to reduce emissions from GSE. The existing program requires GSE average emission airport-wide fleet performance targets for NO_X of 1.8 grams per brake horsepower-hour by 2023 and 1.0 grams per brake horsepower-hour by 2031. Furthermore, in 2019 LAWA enacted an Electric GSE Incentive Program to facilitate the expeditious achievement of the aforementioned fleet-wide performance targets, granting $500,000 in funding to offset the incremental purchase cost of zero-emission GSE as compared to conventionally fueled equipment.[4] Therefore, LAWA is already implementing all feasible measures to reduce emissions from GSE, and it would not be feasible for LAWA to do more than it already is to transition baggage tugs, belt loaders, lifts, pushback tractors, or other similar GSE at LAX to alternative fuels. For these reasons, the suggested measure will not be included as mitigation for the proposed Project.
ATMP-PC035-87	Power project-related buildings with 100 percent renewable electricity.	As concluded in Section 4.3 of the Draft EIR, the impact of the proposed Project with respect to electricity consumption would be less than significant. As further described in that section, electricity supplied to the proposed Project would comply with California's Renewable Portfolio Standard. Moreover, Project-related buildings would be constructed with energy efficiency measures required to meet LEED® Silver certification requirements or better. The buildings would also be constructed in accordance with state regulations for renewable energy and energy efficiency, including Title 24 Building Energy Efficiency Standards and the California Green Building Code (CALGreen), as well as local regulations that include requirements for renewable energy and energy efficiency, including the Los Angeles Municipal Code and the Los Angeles Green Building Code (LAGBC). LAWA's electrical needs are met by the Los Angeles Department of Water and Power (LADWP). As discussed in Appendix C.9 of the Draft EIR, LAWA participates in LADWP's Green Power Program, a higher-cost, voluntary program allowing residents, businesses, and government agencies a stake in supporting renewable energy. Moreover, as identified in the SAP, LAWA has a goal of supplying 100 percent of the airport's total electricity through renewable sources, including green power purchases, by 2045.[5] These regulations and programs will apply to all buildings constructed as part of the proposed Project. Therefore, CEQA does not require mitigation to further reduce the impact and the suggested measure will not be included as mitigation for the proposed Project.

Table 1
TR-ATMP-AQ/GHG-1-1. Evaluation of New or More Stringent Recommended Air Quality and/or Greenhouse Gas Mitigation Measures Suggested in Comments on the Draft EIR

Comment ID	Suggested New or More Stringent Measure	Evaluation
ATMP-PC035-88	Designate 10 percent of new parking stalls for a combination of low-emitting, fuel-efficient, and carpool/vanpool vehicle.	As detailed in MM-AQ/GHG (ATMP)-4, the Terminal 9 parking facility would be outfitted with electric vehicle (EV) charging infrastructure beyond the minimum amount required by code at the time of design by at least 5 percent. Applicable building codes at the time of publication of the Draft EIR include CALGreen and the LAGBC. The Los Angeles Municipal Code was revised in 2020, and now requires 30 percent of total parking spaces in new non-residential parking facilities to be capable of supporting future electric vehicle supply equipment (EVSE), and that 10 percent of total parking spaces have EV charging stations (EVCS) installed at opening.[6] By the time the Terminal 9 parking facility would be constructed, it is possible that one or more of the aforementioned codes could be amended again to impose more stringent requirements, or a newly applicable local, regional, state, or federal code could impose more stringent requirements. In either case, as indicated in MM-AQ/GHG (ATMP)-4, at the time of construction, the Terminal 9 parking facility would be outfitted with EVSE and EVCS spaces exceeding the required number of these EVSE and EVCS spaces by at least 5 percent. Therefore, the currently adopted code already achieves the suggested EV charging spaces in the comment and LAWA would exceed that through implementation of MM-AQ/GHG (ATMP)-4. For these reasons, the suggested measure will not be included as mitigation for the proposed Project.
ATMP-PC035-89	Install electric vehicle charging ports at three percent of new parking stalls with another three percent “EVSE-ready”.	See the evaluation of ATMP-PC035-88 presented above. The currently adopted code already exceeds the suggestion in the comment and LAWA would exceed that through implementation of MM-AQ/GHG (ATMP)-4. For this reason, the suggested measure will not be included as mitigation for the proposed Project.

Table 1
TR-ATMP-AQ/GHG-1-1. Evaluation of New or More Stringent Recommended Air Quality and/or Greenhouse Gas Mitigation Measures Suggested in Comments on the Draft EIR

Comment ID	Suggested New or More Stringent Measure	Evaluation
ATMP-PC035-90	Implement a Commercial Ground Transportation Clean Vehicle Program.	As described in Section 4.1.1. of the Draft EIR, LAWA already has several existing programs related to providing incentives to encourage the use of alternative fuel vehicles, including: ▪ The LAX Alternative Fuel Vehicle (AFV) Program, which requires the use of clean fuel medium and heavy-duty vehicles at LAX.[7] ▪ The LAX AFV Incentive Program to help fund the purchase of clean fuel medium and heavy-duty vehicles at LAX.[8] ▪ The LAWA Zero-Emission Bus Program, which will convert 20 percent of LAWA's bus fleet to zero-emission by 2023 and 100 percent by 2031.[9] In addition, Mitigation Measure MM-AQ/GHG (ATMP)-5 calls for LAWA to update the Electric Vehicle Purchasing Policy to require 100 percent of LAWA's light-duty vehicle fleet to be electric by 2031. Therefore, an extensive program of commercial ground transportation clean vehicle measures is already in place. For this reason, the suggested measure will not be included as mitigation for the proposed Project.
ATMP-PC035-91	Install shower stalls and lockers, as well as covered bicycle storage for employees.	Improvements associated with the LAX Landside Access Modernization Program and the future LA Metro Airport Metro Connector (AMC) include bike paths to/from those facilities and the provision of bike storage equipment which will be available to LAX employees and passengers wishing to take the Automated People Mover (APM) for travel into and out of the Central Terminal Area (CTA). That means of supporting bicycle use outside of the CTA is considered better and safer than bicyclists using the roadway system within the CTA (i.e., Concourse 0) and Terminal 9. Therefore, the suggested measure will not be included as mitigation for the proposed Project.

Table 1
TR-ATMP-AQ/GHG-1-1. Evaluation of New or More Stringent Recommended Air Quality and/or Greenhouse Gas Mitigation Measures Suggested in Comments on the Draft EIR

Comment ID	Suggested New or More Stringent Measure	Evaluation
ATMP-PC035-92	Implement a parking cash-out program for employees.	As noted in Sections 4.1.1 and 4.8 of the Draft EIR, LAWA currently provides incentives for LAWA employees to take public transit and operates a world-class rideshare program, including vanpool incentives, preferred parking for carpools, and program tracking measures.[10] In addition, LAWA is currently constructing the LAX Landside Access Modernization Program that includes an APM adjacent to the future LA Metro AMC, which will help to support and encourage transit ridership at LAX, including at-grade light rail platforms, bus plaza, bicycle hub, pedestrian plaza, passenger vehicle pick-up and drop-off area, and Metro transit center/terminal building to connect passengers between multiple transportation modes. Relative to Project features, an additional APM station at Terminal 9 is proposed as part of the Project. In addition, a pedestrian connector to the future APM station within the eastern portion of the Central Terminal Area will be constructed as part of the LAX Landside Access Modernization Program, which will provide access to the APM system for passengers and workers at Concourse 0. Together, these measures would support the transit of Project-related employees and passengers. Mitigation Measure MM-T (ATMP)-1 provides for several strategies for expanding and enhancing the existing measures to reduce worker commute trips. Based on the combination of existing measures and the additional measures reflected in Mitigation Measure MM-T (ATMP)-1, LAWA is already undertaking all feasible measures to reduce employee vehicular travel and parking, and a parking "cash-out" program is not necessary. Therefore, the suggested measure will not be included as mitigation for the proposed Project.

Table 1
TR-ATMP-AQ/GHG-1-1. Evaluation of New or More Stringent Recommended Air Quality and/or Greenhouse Gas Mitigation Measures Suggested in Comments on the Draft EIR

Comment ID	Suggested New or More Stringent Measure	Evaluation
ATMP-PC035-93	Diesel engines, whether for off- road or on-road equipment, shall not be left idling for more than two minutes, at any location, except as provided in exceptions to the applicable state regulations regarding idling for off-road and on-road equipment (e.g., traffic conditions, safe operating conditions).	The most stringent feasibly enforceable construction-vehicle idling plan is included in LAWA's DCH, which requires that contractors prohibit the idling of both on-road and off-road equipment in excess of California Air Resources Board (CARB) Vehicle Idling Rules, except where required for safety.[11] Determining specific locations where the CARB rules are superseded by LAWA measures would be difficult to determine and enforce. Moreover, the impact of reducing idling times to two minutes from five minutes was evaluated to determine the impact that such measure would have on project construction NO_X emissions. The idling emissions from haul trucks parked on- or off-site were found to have a negligible impact (1 percent or less) on the peak daily construction NO_X emissions. In addition, off-road construction equipment is intended and designed to be operated under a load set by the operator for a given task, and thus does not spend much time at idle. Reducing the mandatory idling time for off-road equipment from five minutes to two minutes would have a negligible impact on construction emissions and would not substantially lessen the Project's significant environmental effects with respect to construction-related emissions. Therefore, the suggested measure is unnecessary and will not be included as mitigation for the proposed Project.
ATMP-PC035-94	Instruct construction workers and equipment operators on the maintenance and tuning of construction equipment and require that such workers and operators properly maintain and tune equipment in accordance with manufacturer specifications.	LAWA's DCH requires contractors at LAX to develop detailed startup plans for all equipment. An independent Commissioning Authority (CxA) is mandated to ensure that there is written documentation that each of the manufacturer-recommended procedures is included in the startup plans and to develop checklist forms as applicable.[12] Therefore, LAWA is already undertaking all feasible measures to ensure contractors properly maintain and tune construction equipment and the suggested measure will not be included as mitigation for the proposed Project.
ATMP-PC035-95	Before starting onsite ground disturbance, demolition, or construction activities, submit a Construction Emissions Minimization Plan for review and approval. The plan shall include estimates of the construction timeline, with a description of each piece of off-road equipment required. The description may include, but is not limited to, equipment type, equipment manufacturer, engine model year, engine certification (Tier rating), horsepower, and expected fuel usage and hours of operation. For off-road equipment using alternative fuels, the description shall also specify the type of alternative fuel being used. Make the Construction Emissions Minimization Plan available to the public for review onsite during working hours. Post at the construction site a legible and visible sign summarizing the plan. State that the	LAWA's DCH requires contractors to adhere to various detailed plans and procedures including, but not limited to, procedures pertaining to the startup and operation of each unit of equipment, procedures pertaining to emissions minimization for standard construction activities, and vehicle idling restrictions which would serve to reduce Project-related construction emissions. In addition, the DCH requires the use of Tier 4 Final engines in off-road construction equipment greater than 50 horsepower and 2010 model year or newer on-road trucks with a gross vehicle weight rating greater than 14,000 pounds used on LAX construction project.[13] Therefore, LAWA is already undertaking all feasible measures to ensure contractors minimize construction emissions to the greatest extent possible. LAWA publishes Mitigation Monitoring and Reporting Program (MMRP) reports annually for each project that summarize equipment information relative to

Table 1
TR-ATMP-AQ/GHG-1-1. Evaluation of New or More Stringent Recommended Air Quality and/or Greenhouse Gas Mitigation Measures Suggested in Comments on the Draft EIR

Comment ID	Suggested New or More Stringent Measure	Evaluation
	public may ask to inspect the plan for the project at any time during working hours and shall explain how to request to inspect the plan. Post at least one copy of the sign in a visible location on each side of the construction site facing a public right-of-way.	the mitigation measures applicable to that project. These reports are available to the public. The suggested measure to present equipment information to the public would not result in reductions to significant air quality or GHG impacts presented in the Draft EIR and would not serve as mitigation under CEQA. Therefore, the suggested measure will not be included as mitigation for the proposed Project.
ATMP-PC035-96	Develop and implement a phased carbon management program that is consistent with the standards of [Airports Council International] ACI "Level 3+" Airport Carbon Accreditation Program, or equivalent, including calculation of annual carbon emissions from airport activity, identifying emissions reduction targets, tracking progress toward achieving effective carbon management procedures, and publishing an annual biennial carbon footprint report as a component of the Airport's broader environmental sustainability program.	As described in Section 4.4 of the Draft EIR, in 2017, LAX achieved Level 3 accreditation under the ACI ACA program and has maintained this accreditation ever since. To maintain Level 3 accreditation under this program, LAWA develops annual airport-wide GHG emission inventories and actively engages with third parties at LAX to demonstrate independently verifiable three-year rolling average emission reductions for all direct and many indirect airport-related GHG emissions. LAWA publishes annual sustainability reports on its website, the most recent of which at the time of publication of the Final EIR is the 2020 Sustainability Report, which reports on LAWA's carbon accreditation status and GHG emissions.[14] In addition, LAWA's SAP[15] includes a goal to pursue a higher Airport Carbon Accreditation level by 2023.Therefore, LAWA is already undertaking the measures suggested in the comment.
ATMP-PC035-97 Item 1	Obtain Third-party HVAC Commissioning and Verification of Energy Savings	As described in Chapter 2 and Section 4.1.1 of the Draft EIR, Concourse 0 and Terminal 9 would be constructed to meet LEED® Silver certification standards or better, which includes third-party HVAC commissioning and verification of energy savings as a minimum energy performance requirement. Therefore, LAWA is already undertaking the measure suggested in the comment. For this reason, it is not necessary to include the suggested measure as mitigation for the proposed Project.
ATMP-PC035-97 Item 2	Install Higher Efficacy Public Street and Area Lighting	As indicated in LAWA's SAP, airport lighting and lighting within the vicinity of the airport within LAWA's operational control is, and will continue to be, managed and optimized to the extent feasible and safe for airport operations.[16] Therefore, LAWA is already undertaking the measure suggested in the comment. For this reason, it is not necessary to include the suggested measure as mitigation for the proposed Project.
ATMP-PC035-97 Item 3	Limit Outdoor Lighting Requirements	See the evaluation of ATMP-PC035-97 Item 2 presented above. LAWA is already undertaking the measure suggested in the comment. For this reason, it is not necessary to include the suggested measure as mitigation for the proposed Project.

Table 1
TR-ATMP-AQ/GHG-1-1. Evaluation of New or More Stringent Recommended Air Quality and/or Greenhouse Gas Mitigation Measures Suggested in Comments on the Draft EIR

Comment ID	Suggested New or More Stringent Measure	Evaluation
ATMP-PC035-97 Item 4	Establish Onsite Renewable or Carbon-Neutral Energy Systems	LAWA is already in the process of assessing the feasibility of an on-site energy generation and storage system. As reported in LAWA's 2019 SAP, a preliminary solar feasibility study was conducted at LAX which indicated the potential capacity for up to 23.5 MW.[17] LAWA is committed to continuing to explore ways to feasibly implement this technology in a cost-effective manner. For this reason, it is not necessary to include the suggested measure as mitigation for the proposed Project.
ATMP-PC035-97 Item 5	Establish Onsite Renewable Energy System - Solar Power	See the evaluation of ATMP-PC035-97 Item 4 presented above. For the reason cited therein, it is not necessary to include the suggested measure as mitigation for the proposed Project.
ATMP-PC035-97 Item 6	Utilize a Combined Heat and Power System	In April 2015, LAWA completed the replacement of the previous 50-year-old Central Utility Plant (CUP) with a modern and energy efficient natural gas co-generation plant (i.e., combined heat and power system). Therefore, LAWA has already implemented the measure suggested in the comment. For this reason, it is not necessary to include the suggested measure as mitigation for the proposed Project.
ATMP-PC035-97 Item 7	Increase Destination Accessibility	It is unclear as to what is meant by "Increase Destination Accessibility" and, therefore, it is not possible to assess this suggested measure.
ATMP-PC035-97 Item 8	Increase Transit Accessibility	See the evaluation of ATMP-PC035-92 presented above. As explained therein, LAWA is already undertaking all feasible measures to encourage passenger and employee transit ridership at LAX and reduce vehicular travel. Therefore, it is not necessary to include the suggested measure as mitigation for the proposed Project.
ATMP-PC035-97 Item 9	Orient Project Toward Non-Auto Corridor	It is unclear as to what is meant by "Orient Project Toward Non-Auto Corridor"; however, it should be noted, as described above in the evaluation of ATMP-PC035-92, the proposed Project includes provisions for connecting passengers and workers with the APM system (i.e., non-auto transportation system), which also connects to public transit.
ATMP-PC035-97 Item 10	Locate Project near Bike Path/Bike Lane	As described above in the evaluation of ATMP-PC038-91, and discussed further in Section 4.8.3.2 of the Draft EIR, the proposed Project is located in proximity to existing and planned bicycle lanes, bicycle paths, and a multi-use path. Therefore, LAWA is already implementing the measure suggested in the comment. For this reason, it is not necessary to include the suggested measure as mitigation for the proposed Project.

Table 1
TR-ATMP-AQ/GHG-1-1. Evaluation of New or More Stringent Recommended Air Quality and/or Greenhouse Gas Mitigation Measures Suggested in Comments on the Draft EIR

Comment ID	Suggested New or More Stringent Measure	Evaluation
ATMP-PC035-97 Item 11	▪ Provide Pedestrian Network Improvements, such as: ▪ Compact, mixed-use communities ▪ Interconnected street network ▪ Narrower roadways and shorter block lengths ▪ Sidewalks ▪ Accessibility to transit and transit shelters ▪ Traffic calming measures and street trees ▪ Parks and public spaces ▪ Minimize pedestrian barriers ▪ Marked crosswalks ▪ Count-down signal timers ▪ Curb extensions ▪ Speed tables ▪ Raised crosswalks ▪ Raised intersections ▪ Median islands ▪ Tight corner radii ▪ Roundabouts or mini-circles ▪ On-street parking ▪ Planter strips with trees ▪ Chicanes/chokers	These proposed measures are largely inapplicable to the proposed Project, or are already be implemented as part of the proposed Project. The proposed Project does not include the development of mixed-use communities. As described in Section 4.8 of the Draft EIR, the Project would include transit, traffic, sidewalk, crosswalk, curbside, and parking features for the purpose of improving pedestrian and automotive safety and reducing congestion in the roadways in the vicinity of the Project. In addition, as described in Section 4.6 of the Draft EIR, certain portions of the proposed Project would be subject to the requirements of the Century Boulevard Streetscape Plan, which is intended to improve pedestrian walkability, aesthetics, and street front business opportunities along Century Boulevard between Sepulveda Boulevard and La Cienega Boulevard. For these reasons, the suggested measure will not be included as mitigation for the proposed Project.
ATMP-PC035-97 Item 12	Incorporate Bike Lane Street Design (on-site)	See the evaluation of ATMP-PC035-91 presented above. For the reasons cited therein, the suggested measure will not be included as mitigation for the proposed Project.
ATMP-PC035-97 Item 13	Provide Bike Parking in Non-Residential Projects	See the evaluation of ATMP-PC035-91 presented above. For the reasons cited therein, the suggested measure will not be included as mitigation for the proposed Project.
ATMP-PC035-97 Item 14	Provide Electric Vehicle Parking	See the evaluation of ATMP-PC035-88 presented above. For the reasons cited therein, the suggested measure is already proposed.

Table 1
TR-ATMP-AQ/GHG-1-1. Evaluation of New or More Stringent Recommended Air Quality and/or Greenhouse Gas Mitigation Measures Suggested in Comments on the Draft EIR

Comment ID	Suggested New or More Stringent Measure	Evaluation
ATMP-PC035-97 Item 15	Implement Commute Trip Reduction (CTR) Program – Voluntary: ▪ Carpooling encouragement ▪ Ride-matching assistance ▪ Preferential carpool parking ▪ Flexible work schedules for carpools ▪ Half time transportation coordinator ▪ Vanpool assistance ▪ Bicycle end-trip facilities (parking, showers and lockers) ▪ New employee orientation of trip reduction and alternative mode options ▪ Event promotions and publications ▪ Flexible work schedule for employees ▪ Transit subsidies ▪ Parking cash-out or priced parking ▪ Shuttles ▪ Emergency ride home	See the evaluation of ATMP-PC035-91 and ATMP-PC035-92 presented above. For the reason cited therein, the suggested measure is already included as an existing LAWA policy or program, part of the Project design, or already proposed as part of the Project mitigation to reduce employee VMT.
ATMP-PC035-97 Item 16	Implement Commute Trip Reduction (CTR) Program - Required Implementation/Monitoring: ▪ Established performance standards (e.g. trip reduction requirements) ▪ Required implementation ▪ Regular monitoring and reporting	The suggested measure is already covered by LAWA's existing measures for commuter trip reduction and the additional measures set forth in MM-T (ATMP)-1.
ATMP-PC035-97 Item 17	Implement Subsidized or Discounted Transit Program	The suggested measure is already covered by LAWA's existing measures for commuter trip reduction and the additional measures set forth in MM-T (ATMP)-1.
ATMP-PC035-97 Item 18	Provide End of Trip Facilities, including: ▪ Showers ▪ Secure bicycle lockers ▪ Changing spaces	See the evaluation of ATMP-PC035-91 presented above. For the reasons cited therein, the suggested measure will not be included as mitigation for the proposed Project.
ATMP-PC035-97 Item 19	Implement Commute Trip Reduction Marketing, such as: ▪ New employee orientation of trip reduction and alternative mode options ▪ Event promotions ▪ Publications	As described in Response to Comment AL010-112, LAWA already provides for these types of commute trip reduction measures; therefore, the suggested measure will not be included as mitigation for the proposed Project.

Table 1
TR-ATMP-AQ/GHG-1-1. Evaluation of New or More Stringent Recommended Air Quality and/or Greenhouse Gas Mitigation Measures Suggested in Comments on the Draft EIR

Comment ID	Suggested New or More Stringent Measure	Evaluation
ATMP-PC035-97 Item 20	Implement Preferential Parking Permit Program	See the evaluation of ATMP-PC035-92 presented above. For the reasons cited therein, the suggested measure will not be included as mitigation for the proposed Project.
ATMP-PC035-97 Item 21	Price Workplace Parking, such as: ▪ Explicitly charging for parking for its employees ▪ Implementing above market rate pricing ▪ Validating parking only for invited guests ▪ Not providing employee parking and transportation allowances ▪ Educating employees about available alternatives	Such a measure is already included as part of Mitigation Measure MM-T (ATMP)-1; see page 4.8-54 of the Draft EIR.
ATMP-PC035-97 Item 22	Implement Employee Parking "Cash-Out"	See the evaluation of ATMP-PC035-92 presented above. For the reasons cited therein, the suggested measure will not be included as mitigation for the proposed Project.
ATMP-PC035-97 Item 23	Transit System Improvements, including: ▪ Grade-separated right-of-way, including bus only lanes (for buses, emergency vehicles, and sometimes taxis), and other Transit Priority measures. Some systems use guideways which automatically steer the bus on portions of the route ▪ Frequent, high-capacity service ▪ High-quality vehicles that are easy to board, quiet, clean, and comfortable to ride ▪ Pre-paid fare collection to minimize boarding delays ▪ Integrated fare systems, allowing free or discounted transfers between routes and modes ▪ Convenient user information and marketing programs ▪ High quality bus stations with Transit Oriented Development in nearby areas ▪ Modal integration, with BRT service coordinated with walking and cycling facilities, taxi services, intercity bus, rail transit, and other transportation services	As described in Section 4.8 of the Draft EIR, the proposed Project includes various road network and transit improvements designed to alleviate traffic and improve transit access including, but not limited to: ▪ Integration with the currently under construction LAX Landside Access Modernization Program APM and the LA Metro AMC ▪ Provision of a new APM station at Terminal 9, which would provide state-of-the art, frequent, high-capacity service ▪ Construction of elevated roadways accessing the CTA designed to queue airport-related vehicular traffic off local roadways ▪ Connectivity to the future Intermodal Transportation Facility (ITF)-West Therefore, LAWA is already undertaking all feasible measures to encourage passenger and employee transit ridership at LAX and reduce vehicular travel.
ATMP-PC035-97 Item 24	Implement Transit Access Improvements, such as: ▪ Sidewalk/crosswalk safety enhancements ▪ Bus shelter improvements	See the evaluation of ATMP-PC035-97 Item 11 and ATMP-PC035-97 Item 23 presented above. As noted, the proposed Project already includes transit access improvements.

Table 1
TR-ATMP-AQ/GHG-1-1. Evaluation of New or More Stringent Recommended Air Quality and/or Greenhouse Gas Mitigation Measures Suggested in Comments on the Draft EIR

Comment ID	Suggested New or More Stringent Measure	Evaluation
ATMP-PC035-97 Item 25	Expand Transit Network	See the evaluation of ATMP-PC035-92 presented above. The proposed Project would already expand the transit network through the addition of an APM station at Terminal 9, which is intended to link Terminal 9 to the APM system.
ATMP-PC035-97 Item 26	Increase Transit Service Frequency/Speed	See the evaluation of ATMP-PC035-97 Item 23 presented above. For the reason cited therein, the suggested measure will not be included as mitigation for the proposed Project.
ATMP-PC035-97 Item 27	Provide Bike Parking Near Transit	See the evaluation of ATMP-PC035-91 presented above. Bike parking is already being provided as part of the LAX Landside Access Modernization Program facilities that support bicycle access.
ATMP-PC035-97 Item 28	Provide Local Shuttles	LAWA and private operators already provide local shuttles. In addition, Mitigation Measure MM-T (ATMP)-1 already provides for on-demand micro-transit shuttles – see pages 4.8-53 and 4.8-54 of the Draft EIR.
ATMP-PC035-97 Item 29	Implement Area or Cordon Pricing	At the time of the publication of the Draft EIR, transit modes to and from the airport include personal passenger vehicles and private car/limousine services, LAX FlyAways and private shuttle services, transportation networking companies (such as Uber and Lyft), and bus services. Upon the completion of the LAX Landside Access Modernization Program and the LA Metro AMC, light rail will become another feasible method of accessing the airport. A curb management strategy, which may include congestion pricing, will be evaluated as part of the LAX Landside Access Modernization Program to determine mode assignments both in and out of the CTA. It should be noted that, while congestion pricing may be able to reduce traffic within the CTA and serve to encourage other modes of travel, those types of VMT reductions are anticipated to already occur in conjunction with implementation of the LAX Landside Access Modernization Program, specifically through reassigning various travel modes to the ITF-West and ITF East; in turn, ITF-West and ITF East will provide connections between the CTA and bus and rail transit via the APM system. It is possible that LAWA would not need to implement congestion pricing to reduce VMT, but evaluation of such a measure is, nevertheless, being included in the list of potential VMT reduction strategies for the proposed Project. LAWA is currently preparing a Request for Proposals (RFP) for a congestion pricing feasibility study. LAWA intends to release this RFP in the Fall of 2021. Relative to curb management, that is a separate effort not related to the LAX Airfield and Terminal Modernization Project; therefore, the suggested measure will not be included as mitigation for the proposed Project.

Table 1
TR-ATMP-AQ/GHG-1-1. Evaluation of New or More Stringent Recommended Air Quality and/or Greenhouse Gas Mitigation Measures Suggested in Comments on the Draft EIR

Comment ID	Suggested New or More Stringent Measure	Evaluation
ATMP-PC035-97 Item 30	Improve Traffic Flow, such as: ▪ Signalization improvements to reduce delay ▪ Incident management to increase response time to breakdowns and collisions ▪ Intelligent Transportation Systems (ITS) to provide real-time information regarding road conditions and directions ▪ Speed management to reduce high free-flow speeds	As discussed in Topical Response TR-ATMP-T-1, a project's effect on automobile delay, as measured by level of service (LOS) or other similar measures is not a significant environmental impact. The State CEQA Guidelines do not require mitigation where a project will not have a significant environmental impact. (See State CEQA Guidelines, Section 15126.4(a)(3).) It should be noted that traffic flow would be improved with the implementation of the features that LAWA is already undertaking described in the evaluation of ATMP-PC035-97 Item 23 presented above.
ATMP-PC035-97 Item 31	Required Project Contributions to Transportation Infrastructure Improvement Projects	See the evaluation of ATMP-PC035-92, ATMP-PC035-97 Item 23, and ATMP-PC035-97 Item 30 presented above. As described in these measures, LAWA is already undertaking transportation infrastructure improvements as part of the proposed Project. Moreover, Mitigation Measure MM-T (ATMP)-1 provides several strategies for reducing vehicular traffic. Finally, a project's effect on automobile delay is not a significant environmental impact and, therefore, it is not necessary to include this measure as mitigation for the proposed Project.
ATMP-PC035-97 Item 32	Utilize Alternative Fueled Vehicles, such as: ▪ Biodiesel (B20) ▪ Liquefied Natural Gas (LNG) ▪ Compressed Natural Gas (CNG)	See the evaluation of ATMP-PC035-90 presented above. For the reason cited therein, the suggested measure will not be included as mitigation for the proposed Project.
ATMP-PC035-97 Item 33	Use Gray Water	As discussed in Section 2.4.4 of the Draft EIR, as part of the proposed Project, reclaimed water lines would be extended from the CTA to Terminal 9 and Concourse 0. Moreover, as identified in Table 2-3 of the Draft EIR, Concourse 0 and Terminal 9 would be capable of using reclaimed water from pipelines (i.e., "purple pipe" or similar reclaimed water solutions) as feasible and permitted, and in accordance with the commitments incorporated into the Water Supply Assessment prepared by LADWP for the proposed Project. Also, see the evaluation of ATMP-PC035-97 Item 35 presented below. Therefore, LAWA is already undertaking all feasible measures to use reclaimed water and it is not necessary to include the suggested measure as mitigation for the proposed Project.

Table 1
TR-ATMP-AQ/GHG-1-1. Evaluation of New or More Stringent Recommended Air Quality and/or Greenhouse Gas Mitigation Measures Suggested in Comments on the Draft EIR

Comment ID	Suggested New or More Stringent Measure	Evaluation
ATMP-PC035-97 Item 34	Use Locally Sourced Water Supply	LADWP provides water service to the Project area. Sources of water in the LADWP service area are described in Section 4.9.1 of the Draft EIR. Recycled water in the LAX area is currently provided by the West Basin Municipal Water District's (WBMWD) Edward C. Little Water Recycling Facility (ECLWRF), some of which is used to irrigate landscaping at LAX (Section 4.9.1.3.2 of the Draft EIR). As described in Section 4.9.1.3.1.2 of the Draft EIR, the SAP identifies a goal to increase reclaimed water use by 35 percent and decrease potable water use by 30 percent by 2035, and to eliminate potable water consumption for non-potable uses such as landscaping and industrial uses by 2045. In addition, as described in Chapter 2, Section 2.4.4, of the Draft EIR, LAWA recently entered into an agreement with LADWP to provide reclaimed water to LAX from a new, advanced water purification facility planned to be built at the Hyperion Water Reclamation Plant, which will provide high-quality reclaimed water for airport and other local uses. Therefore, LAWA is already undertaking all feasible measures to use locally-sourced water and the suggested measure will not be included as mitigation for the proposed Project.
ATMP-PC035-97 Item 35	Adopt a Water Conservation Strategy	LAWA's SAP details water conservation and reduction targets and timelines to achieve those targets.[18] The SAP also includes comprehensive water conservation and water-reduction strategies and implementation actions to achieve those targets including, but not limited to: ▪ The elimination of potable water consumption for non-potable uses, such as landscaping and cooling towers; ▪ Improved metering and submetering technologies for water monitoring and use management; ▪ Expanding the reclaimed water network and uses; ▪ Enhanced requirements for water use and reuse efficiencies; ▪ Installation of native, drought-resistant landscaping and vegetation and weather-based water-use controllers; and ▪ Auditing of existing in-use buildings at LAX to identify water-efficient upgrades to plumbing fixtures and other water uses. As discussed in Section 4.9.1 of the Draft EIR, the proposed Project would be required to conform to various policies and codes concerning water use, including CALGreen, the California Plumbing Code, the Los Angeles Green Building Code, the Los Angeles Plumbing Code, and California Code of Regulations Title 23, Division 2, Chapter 2.7, Model Water Efficient Landscape Ordinance. In addition to conforming to code requirements, as listed in Chapter 2 and in Section 4.9.1 of the Draft EIR, LAWA committed to a number of water conservation measures for the proposed Project that are in addition to those required by codes and ordinances as part of the

Table 1
TR-ATMP-AQ/GHG-1-1. Evaluation of New or More Stringent Recommended Air Quality and/or Greenhouse Gas Mitigation Measures Suggested in Comments on the Draft EIR

Comment ID	Suggested New or More Stringent Measure	Evaluation
		LADWP's Water Supply Assessment. Therefore, LAWA is already undertaking all feasible measures to conserve water and the suggested measure will not be included as mitigation for the proposed Project.
ATMP-PC035-97 Item 36	Design Water-Efficient Landscapes (see California Department of Water Resources Model Water Efficient Landscape Ordinance), such as: ▪ Planting vegetation with minimal water needs, such as native species ▪ Choosing vegetation appropriate for the climate of the project site ▪ Choosing complimentary plants with similar water needs or which can provide each other with shade and/or water	As identified in Table 2-3 of the Draft EIR, and in accordance with the commitments incorporated into the Water Supply Assessment prepared by LADWP for the proposed Project as described in Section 4.9.1.5.2.2 of the Draft EIR, drought-tolerant landscaping and micro-irrigation would be installed for all project-related landscaping to reduce potable water consumption. Therefore, LAWA is already undertaking all feasible measures to implement water-efficient landscaping. Also see the evaluation of ATMP-PC035-97 Item 35 presented above. For these reasons, the suggested measure will not be included as mitigation for the proposed Project.
ATMP-PC035-97 Item 37	Plant Native Trees and Vegetation	See the evaluation of ATMP-PC035-97 Item 35 and ATMP-PC035-97 Item 36 presented above. For the reasons cited therein, the suggested measure is already included as an existing LAWA policy or program and as part of the Project design.
ATMP-PC035-97 Item 38	Urban Tree Planting	In FAA's *Wildlife Hazard Management at Airports* manual, the FAA recommends that vegetation at airports have a low attraction to birds, small mammals, and insects to minimize the risk of bird strikes on operating aircraft.[19] Therefore, large-scale urban tree planning at LAX is not appropriate for reasons of public safety. Moreover, with respect to the suggestion to implement urban tree planting in order to mitigate GHG impacts, as indicated in 49 U.S.C. §§ 47107(b)(1) and 47133(a), the use of airport revenue for purposes other than airport capital or operating costs is generally considered "revenue diversion" and is prohibited by federal law. Off-site programs, such as off-site urban tree planting, are beyond the scope of the proposed Project and would be an unlawful diversion of airport revenue. Therefore, the suggested measure will not be included as mitigation for the proposed Project. However, any trees removed by the proposed Project would be replaced as required by City code and permits within the boundaries of LAX or at a suitable off-site location in proximity to the proposed Project. If replacement trees are planted within LAX boundaries, the replacement site and tree species would be determined in consultation with LAWA's U.S. Department of Agriculture (USDA) Wildlife Hazard Biologist and would be consistent with FAA Advisory Circular No. 150/5200-33C, *Hazardous Wildlife Attractants on or Near Airports*,[20] and LAWA's *LAX Wildlife Management Plan*[21] to avoid increasing wildlife hazards to aircraft.

Table 1
TR-ATMP-AQ/GHG-1-1. Evaluation of New or More Stringent Recommended Air Quality and/or Greenhouse Gas Mitigation Measures Suggested in Comments on the Draft EIR

Comment ID	Suggested New or More Stringent Measure	Evaluation
ATMP-PC035-97 Item 39	Create New Vegetated Open Space	See the evaluation of ATMP-PC035-97 Item 38 presented above. Similar to the planting of new trees, LAWA must be cautious with respect to creating new vegetated open space, based on the aforementioned restrictions on creating wildlife attractants at/near the airport. Therefore, creation of new vegetated open space at LAX is not feasible mitigation for Project-related GHG emissions and, as discussed in ATMP-PC035-97 Item 38 above, off-site mitigation is beyond the scope of the proposed Project and would be an unlawful diversion of airport revenue. Therefore, the suggested measure will not be included as mitigation for the proposed Project. It should be noted that LAWA has revegetated ground that has been previously cleared of vegetation at LAX on a limited basis, such as when vegetation is removed/disturbed during construction activities. In those cases, revegetation occurred with FAA-approved types of vegetation that minimize wildlife attraction.
ATMP-PC035-97 Item 40	Use Alternative Fuels for Construction Equipment	LAWA's DCH requires contractors to use the cleanest available construction equipment meeting or exceeding USEPA Tier 4 final emission standards. If it is infeasible for a contractor to use the cleanest possible equipment due to equipment availability or ability, a contractor must document to LAWA's satisfaction that a good faith effort was made to acquire the cleanest equipment and, if approved, may use the next cleanest feasible equipment.[22] In addition, LAWA is requiring the use of Renewable Diesel Fuel in Mitigation Measure MM-AQ/GHG (ATMP)-2, depending on availability, as discussed in Section 4.1.1. Therefore, LAWA is already undertaking all feasible measures to require alternative fuels for construction equipment and the suggested measure will not be included as mitigation for the proposed Project.
ATMP-PC035-97 Item 41	Urban Tree Planting	See the evaluation of ATMP-PC035-97 Item 38 presented above.
ATMP-PC035-97 Item 42	Use Electric and Hybrid Construction Equipment	See the evaluation of ATMP-PC035-97 Item 40 presented above. For the reasons cited therein, the suggested measure will not be included as mitigation for the proposed Project.
ATMP-PC035-97 Item 43	Limit Construction Equipment Idling Beyond Regulation Requirements	See the evaluation of ATMP-PC035-93 presented above. For the reasons cited therein, the suggested measure will not be included as mitigation for the proposed Project.

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Comment ID	Suggested New or More Stringent Measure	Evaluation
ATMP-PC035-97 Item 44	Institute a Heavy-Duty Off-Road Vehicle Plan, including: ▪ Construction vehicle inventory tracking system ▪ Requiring hour meters on equipment ▪ Document the serial number, horsepower, manufacture age, fuel, etc. of all onsite equipment ▪ Daily logging of the operating hours of the equipment	LAWA tracks construction equipment operating at the airport to the extent required in the DCH to confirm that construction equipment operating at the airport conforms to the requirements of LAWA's clean construction policy. Additionally, see the evaluation of ATMP-PC035-95 presented above. For these reasons, the suggested measure will not be included as mitigation for the proposed Project.
ATMP-PC035-97 Item 45	Implement a Construction Vehicle Inventory Tracking System	See the evaluation of ATMP-PC035-97 Item 44 presented above. For the reasons cited therein, the suggested measure will not be included as mitigation for the proposed Project.
ATMP-PC035-97 Item 46	Establish a Carbon Sequestration Project, such as: ▪ Geologic sequestration or carbon capture and storage techniques, in which CO_2 from point sources is captured and injected underground ▪ Terrestrial sequestration in which ecosystems are established or preserved to serve as CO_2 sinks ▪ Novel techniques involving advanced chemical or biological pathways ▪ Technologies yet to be discovered	As indicated in 49 U.S.C. §§ 47107(b)(1) and 47133(a), the use of airport revenue for purposes other than airport capital or operating costs is generally considered "revenue diversion" and is prohibited by federal law. Off-site carbon sequestration or other off-site programs is beyond the scope of the proposed Project and would be an unlawful diversion of airport revenue. In addition, the measures set forth in the comment are unknown, experimental or unproven, rely on technology that does not exist, or rely on offsetting emissions in a manner that has not been recognized by CARB or other regulatory authorities as appropriate mitigation of GHG emissions for purposes of CEQA. Therefore, the suggested measure will not be included as mitigation for the proposed Project.
ATMP-PC035-97 Item 47	Establish Off-Site Mitigation	See the evaluation of ATMP-PC035-97 Item 46 presented above. For the reason cited therein, the suggested measure will not be included as mitigation for the proposed Project.
ATMP-PC035-97 Item 48	Use Local and Sustainable Building Materials	LAWA's DCH requires compliance with the City of Los Angeles Demolition Debris Recycling Program, which outlines disposal permitting requirements, reporting and documentation requirements, and other requirements related to AB 939 diversion goals.[23] In addition, Mitigation Measure MM-GHG (ATMP)-1 sets forth a requirement for construction contractors to recycle or salvage a minimum of 85 percent of non-hazardous construction and demolition waste generated directly from the construction of the Project. Further, Concourse 0 and Terminal 9 would be constructed to meet LEED® Silver certification standards or better, with LEED® points available for building materials with a high recycled material content. Therefore, LAWA is already undertaking all feasible measures to use local and sustainable building materials and the suggested measure will not be included as mitigation for the proposed Project.

Table 1
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ATMP-PC035-97 Item 49	Require Environmentally Responsible Purchasing, such as: ▪ Purchasing products with sustainable packaging ▪ Purchasing post-consumer recycled copier paper, paper towels, and stationary ▪ Purchasing and stocking communal kitchens with reusable dishes and utensils ▪ Choosing sustainable cleaning supplies ▪ Leasing equipment from manufacturers who will recycle the components at their end of life ▪ Choosing ENERGY STAR appliances and Water Sense-certified water fixtures ▪ Choosing electronic appliances with built in sleep-mode timers ▪ Purchasing 'green power' (e.g. electricity generated from renewable or hydropower) from the utility ▪ Choosing locally-made and distributed products	Mitigation Measure MM-GHG (ATMP)-3 requires LAWA to identify requirements and standards for products or services that have a lesser or reduced effect on human health and the environment when compared with competing products or services that serve the same purpose. Additionally, LAWA's SAP includes the adoption of a formal Environmentally Preferred Purchasing (EPP) Policy, monitoring purchasing and procurement activities, and reducing over-ordering and single-use material. The proposed EPP Policy would specify mandates for the durability of equipment and supplies, prioritize reusable shipping and packaging options from large suppliers, establish targets for single-use items, and develop a product selection criteria process.[24] In addition, LAWA recently adopted a policy that will phase out single-use plastic bottles at LAX by 2023.[25] For these reasons, the suggested measure will not be included as mitigation for the proposed Project.

Source: CDM Smith, May 2021.

Notes:

[1] City of Los Angeles, Los Angeles World Airports, *2020 Design and Construction Handbook (DCH)*, Version 1.0, June 30, 2020. Available: https://www.lawa.org/lawa-businesses/lawa-documents-and-guidelines/lawa-design-and-construction-handbook.

[2] City of Los Angeles, Los Angeles World Airports, *Sustainability Action Plan*, 2019. Available: https://cloud1lawa.app.box.com/s/63i2teszgnld5aws68xbou6yc0inl5rp.

[3] City of Los Angeles, Los Angeles World Airports, *Ground Support Equipment Emissions Policy*, October 22, 2019. Available: https://www.lawa.org/-/media/lawa-web/environment/files/lax_gse_emission_reduction_policy_boac.ashx.

[4] City of Los Angeles, Los Angeles World Airports, *LAX Electric Ground Support Equipment Incentive Program*, August 2019. Available: https://www.lawa.org/-/media/lawa-web/environment/files/gse-emissions-reduction-program/lax-funding-opportunity-announcement-and-application-preparation-package.ashx.

[5] City of Los Angeles, Los Angeles World Airports, *Sustainability Action Plan*, 2019. Available: https://cloud1lawa.app.box.com/s/63i2teszgnld5aws68xbou6yc0inl5rp.

[6] City of Los Angeles, *Ordinance No. 186485*, Council File No. 17-0309, Effective January 28, 2020. Available: https://www.ladbs.org/docs/default-source/publications/misc-publications/ordinance-186485.pdf?sfvrsn=2.

[7] City of Los Angeles, Los Angeles World Airports, *Alternative Fuel Vehicle Requirement Program (LAX Only)*, October 2017. Available: https://www.lawa.org/-/media/lawa-web/environment/files/altfuelvehreq.ashx.

[8] City of Los Angeles, Los Angeles World Airports, *Zero & Near-Zero Emission Heavy-Duty Vehicle Incentive Program*, January 17, 2019. Available: https://www.lawa.org/-/media/lawa-web/environment/files/zero-and-near-zero-emission-heavy-duty-vehicle-incentive-program-application.ashx.

[9] The Zero-Emission Bus Program is a requirement of the LAX-SCAQMD MOU.

[10] City of Los Angeles, Los Angeles World Airports, *LAWA Rideshare webpage*. Available: https://www.lawa.org/lawa-environment/environmental-programs-group/lawa-rideshare, accessed October 20, 2020.

[11] City of Los Angeles, Los Angeles World Airports, *2020 Design and Construction Handbook (DCH)*, Version 1.0, June 30, 2020. Available: https://www.lawa.org/lawa-businesses/lawa-documents-and-guidelines/lawa-design-and-construction-handbook.

Table 1
TR-ATMP-AQ/GHG-1-1. Evaluation of New or More Stringent Recommended Air Quality and/or Greenhouse Gas Mitigation Measures Suggested in Comments on the Draft EIR

Comment ID	Suggested New or More Stringent Measure	Evaluation

[12] City of Los Angeles, Los Angeles World Airports, *2020 Design and Construction Handbook (DCH)*, Version 1.0, June 30, 2020. Available: https://www.lawa.org/lawa-businesses/lawa-documents-and-guidelines/lawa-design-and-construction-handbook.
[13] City of Los Angeles, Los Angeles World Airports, *2020 Design and Construction Handbook (DCH)*, Version 1.0, June 30, 2020. Available: https://www.lawa.org/lawa-businesses/lawa-documents-and-guidelines/lawa-design-and-construction-handbook.
[14] City of Los Angeles, Los Angeles World Airports, *2019 Sustainability Report.* Available: https://www.lawa.org/en/lawa-sustainability.
[15] City of Los Angeles, Los Angeles World Airports, *Sustainability Action Plan*, 2019. Available: https://cloud1lawa.app.box.com/s/63i2teszgnld5aws68xbou6yc0inl5rp.
[16] City of Los Angeles, Los Angeles World Airports, *Sustainability Action Plan,* 2019. Available: https://cloud1lawa.app.box.com/s/63i2teszgnld5aws68xbou6yc0inl5rp.
[17] City of Los Angeles, Los Angeles World Airports, *Sustainability Action Plan,* 2019. Available: https://cloud1lawa.app.box.com/s/63i2teszgnld5aws68xbou6yc0inl5rp.
[18] City of Los Angeles, Los Angeles World Airports, *Sustainability Action Plan,* 2019. Available: https://cloud1lawa.app.box.com/s/63i2teszgnld5aws68xbou6yc0inl5rp.
[19] U.S. Department of Transportation, Federal Aviation Administration, *Wildlife Hazard Management at Airports*, *Second Edition*, July 2005. Available: https://www.faa.gov/airports/airport_safety/wildlife/resources/media/2005_faa_manual_complete.pdf.
[20] U.S. Department of Transportation, Federal Aviation Administration, Advisory Circular 150/5200-33C, *Hazardous Wildlife Attractants on or Near Airports*, 2020.
[21] City of Los Angeles, Los Angeles World Airports in cooperation with U.S. Department of Agriculture, Animal and Plant Health Inspection Service, Wildlife Services, *Los Angeles International Airport (LAX) Wildlife Hazard Management Plan*, December 2016.
[22] City of Los Angeles, Los Angeles World Airports, *2020 Design and Construction Handbook (DCH)*, *Version 1.0*, June 30, 2020. Available: https://www.lawa.org/lawa-businesses/lawa-documents-and-guidelines/lawa-design-and-construction-handbook.
[23] City of Los Angeles, Los Angeles World Airports, *2020 Design and Construction Handbook (DCH)*, *Version 1.0*, June 30, 2020. Available: https://www.lawa.org/lawa-businesses/lawa-documents-and-guidelines/lawa-design-and-construction-handbook.
[24] City of Los Angeles, Los Angeles World Airports, *Sustainability Action Plan*, 2019. Available: https://cloud1lawa.app.box.com/s/63i2teszgnld5aws68xbou6yc0inl5rp.
[25] City of Los Angeles, Los Angeles World Airports, *Press Release: Los Angeles Board of Airport Commissioners Approves Phasing Out Single-Use Plastic Bottles at LAX and Van Nuys Airports*, July 8, 2021. Available: https://www.lawa.org/news-releases/2021/news-release-034; accessed July 18, 2021.

Summary

In summary, as noted previously, the Draft EIR evaluated almost 100 potentially applicable measures for the reduction of air quality and GHG emissions across a broad range of mitigation types. This extensive evaluation resulted in the identification of 11 mitigation measures that would address air quality and/or GHG emissions. Some of the measures suggested in the comments on the Draft EIR would not reduce air quality or GHG emissions and are not suitable mitigation measures. Other suggested measures are either already being implemented at LAX under existing LAWA programs and requirements, have already been identified as a Project feature, were already incorporated into a mitigation measure included in the Draft EIR, or were previously considered and found to be inapplicable, ineffective, or infeasible. An evaluation of suggested measures is provided above in Table 1. As shown in the table, with the exception of those measures that are already incorporated into identified mitigation, none of these measures is considered to be applicable or feasible as mitigation of Project-related air quality or GHG impacts. The mitigation measures that are already included in the Draft EIR demonstrate a commitment by LAWA to reduce air quality and GHG emissions to the maximum extent feasible.

TR-ATMP-N-1: Health Effects of Noise on Humans

As described in Section 4.7.1.1.3 of the Draft EIR, noise or unwanted sound is known to have several adverse effects on humans, such as hearing loss, communication interference, sleep disturbance, physiological responses, and annoyance (Section 4.7.1.2.3). Several comments submitted on the Draft EIR suggested that human health effects were not taken into account in the evaluation of aircraft noise impacts. This topical response outlines health effects of noise that have been identified in existing research and summarizes LAWA's current understanding on the topic. For more detail on the adequacy of the aircraft noise analysis and use of alternative metrics to determine health impacts, please see Topical Response TR-ATMP-N-2.

FAA

The Federal Aviation Administration's (FAA) Federal Register Notice, Overview of FAA Aircraft Noise Policy and Research Efforts: Request for Input on Research Activities to Inform Aircraft Noise Policy published January 13, 2021 provides an overview of ongoing research efforts by the FAA to determine the effects of aircraft noise on human health.[43] As noted in that federal register notice, the FAA is conducting or is planning to conduct research on the topics of speech interference and children's learning, health and human impacts, impacts to cardiovascular health, sleep disturbance, economic impacts of noise, and community response to aircraft noise. However, the FAA has not changed its policy and regulations related to the findings of this ongoing research or the use of alternative metrics to assess health impacts (see Topical Response TR-ATMP-N-2 for more information).

As outlined in Section 4.7.1.3.1.1 of the Draft EIR, *FAA Order 1050.1F, Environmental Impacts: Policies and Procedures*, provides FAA's policies and procedures for evaluating environmental impacts of all agency actions in compliance with the National Environmental Policy Act (NEPA) and the implementing regulations issued by the federal Council on Environmental Quality (CEQ).[44] FAA Order 1050.1F identifies significance thresholds for aircraft noise. These thresholds are based on the annual average daily Day-Night Average Sound Level (DNL). In accordance with FAA Order 1050.1F, a proposed action would have a significant noise impact if it would cause a noise-sensitive land use that is already located within the 65

[43] U.S. Department of Transportation, Federal Aviation Administration, *Overview of FAA Aircraft Noise Policy and Research Efforts: Request for Input on Research Activities To Inform Aircraft Noise Policy*, FR Vol 86, No. 8, January 13, 2021. Available: https://www.federalregister.gov/documents/2021/01/13/2021-00564/overview-of-faa-aircraft-noise-policy-and-research-efforts-request-for-input-on-research-activities#print.

[44] U.S. Department of Transportation, Federal Aviation Administration, *Order 1050.1F, Environmental Impacts: Policies and Procedures,* July 16, 2015. Available: https://www.faa.gov/documentLibrary/media/Order/FAA_Order_1050_1F.pdf.

DNL noise contour to experience an increase in noise of DNL 1.5 A-weighted sound pressure level (dBA) or more, or if it would newly expose a noise-sensitive land use to the DNL 65 dBA level due to a DNL 1.5 dBA or greater increase. The Order provides for the use of Community Noise Equivalent Level (CNEL) instead of DNL in California.[45] It also requires the use of the FAA-approved model (Aviation Environmental Design Tool [AEDT]) to assess aircraft noise impacts.

ICAO Aviation Noise Impacts White Paper

In 2019, the International Civil Aviation Organization (ICAO) published its 2019 Environmental Report, *Aviation and Environment*.[46] Chapter 2 of the report discusses the Aviation Noise Impacts White Paper, which provides an overview of the state of the science related to aviation noise impacts as of 2019. It covers community noise annoyance, sleep disturbance, health impacts, children's learning, helicopter noise, en-route noise from supersonic aircraft, Urban Air Mobility (UAM)/ Unmanned Aerial Systems (UAS) noise, and the economic costs of aviation noise. Some findings included in the White Paper are outlined below:

- The best epidemiological evidence for health effects of aircraft noise relates to cardiovascular disease, and in particular for new cases of ischemic heart disease. These findings are consistent with findings of heart disease from road traffic noise.
- Evidence exists to support the likelihood that the association between aircraft noise and heart disease observed in epidemiological studies is causal however the exact magnitude of the exposure-response estimate varies between studies, and estimates are likely to change as further studies are completed.
- There are important gaps in the evidence for other health outcomes. Few studies have been conducted in relation to aircraft noise and mental health, or maternal health and birth outcomes.
- Most health studies have used cumulative metrics (e.g., DNL/CNEL) as these have been used extensively. However, there is a need to examine other noise metrics that may be more relevant to health outcomes.

Specific Adverse Impacts Including Health Impacts

Hearing Loss

Hearing loss is not generally associated with community noise problems, even very near a major airport or a major freeway. The Occupational Safety and Health Administration (OSHA) identifies a noise exposure limit of 90 dBA for 8 hours per day to protect from hearing loss in occupational settings (higher limits are allowed for shorter duration exposures). Noise levels in neighborhoods, even in very noisy neighborhoods, are not sufficiently loud to cause hearing loss.

Communication Interference

Communication interference includes speech interference and interference with activities such as watching television. Normal conversational speech is in the range of 60 to 65 dBA and any noise in this range or louder may interfere with speech. There are specific methods of describing speech interference as a function of distance between speaker and listener and voice level.

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[45] U.S. Department of Transportation, Federal Aviation Administration, Office of Environment and Energy, *1050.1F Desk Reference*, *Version 2*, "Noise and Noise-Compatible Land Use," page 11-2, February 2020. https://www.faa.gov/about/office_org/headquarters_offices/apl/environ_policy_guidance/policy/faa_nepa_order/desk_ref/media/desk-ref.pdf.

[46] International Civil Aviation Organization, *2019 Environmental Report Aviation and Environment: Destination Green The Next Chapter*, 2019. Available: https://www.icao.int/environmental-protection/pages/envrep2019.aspx.

Sleep Disturbance

Sleep disturbance is another cause of annoyance due to noise. Noise can make it difficult to fall asleep and create momentary disturbances of natural sleep patterns by causing shifts from deep to lighter stages. Noise may even cause awakening, which a person may or may not be able to recall. Extensive research has been conducted on the effect of noise on sleep disturbance. Section 4.7.1.1.3 of the Draft EIR gives a detailed overview of the research and studies that have been completed relative to noise-related sleep disturbance. The conclusion of that review is that a standard to evaluate the impact of combined multiple events has not been established.

The FAA has initiated a research study to collect representative information on the effects of aircraft noise on sleep. This data will help the FAA update sleep standards. The study is expected to take approximately two years to complete, and the FAA is currently assessing comments received on what should be included in the study (the FAA closed the comment period on January 27, 2020).[47] Following completion of the study, it is anticipated that the FAA will consider the findings of the study relative to any potential updates to, or validation of, the national aviation noise policy.

With regard to addressing potential sleep disturbance impacts within this EIR, please see Topical Response TR-ATMP-N-2.

Physiological Responses

Physiological responses are those measurable effects of noise on people that are realized as changes in pulse rate, blood pressure, etc. Although such effects can be induced and observed, the extent is not known to which these physiological responses cause harm or are a sign of harm. Generally, physiological responses are a reaction to a loud short-term noise such as a rifle shot or a very loud jet overflight. As described on pages 4.7.1-12 and 4.7.1-13 of the Draft EIR, health effects from noise, where they may exist, are associated with a wide variety of other environmental stressors as well, and isolating the effects of aircraft noise alone as a source of long-term physiological change has proved nearly impossible. It has not been possible for research to conclude causal relations between health disorders and noise exposure.[48]

Cardiovascular Effects

Cardiovascular refers to effects on the heart and blood vessels. In October 2013, two studies on cardiovascular disease associated with aircraft noise were published in the British Medical Journal. The first was done in the United Kingdom around Heathrow Airport in London, and the second was done in the United States as part of a multi-airport retrospective study led by researchers from Boston University and the Harvard School of Public Health as part of the Partnership for Air Transportation Noise and Emissions Reduction (PARTNER) program sponsored by the FAA. The U.S. study focused on Medicare patients, and the British study was based on the total population living around Heathrow. Both studies identified a correlation linking noise to cardiovascular disease, but due to limitations in the studies and the potential for alternative explanations of causal associations, both studies recommended that further research be done to better understand and strengthen the causal interpretation of the relationship between aircraft noise and cardiovascular disease. Neither study provided a definitive noise dose and

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47 U.S. Department of Transportation, Federal Aviation Administration, *Agency Information Collection Activities: Request for Comments; Clearance of a New Approval of Information Collection: National Sleep Study*, 84 Fed. Reg. 65453, November 27, 2019. Available: https://www.federalregister.gov/documents/2019/11/27/2019-25714/agency-information-collection-activities-requests-for-comments-clearance-of-a-new-approval-of.

48 Transportation Research Board of the National Academies, Airport Cooperative Research Program, *ACRP Synthesis 9, Effects of Aircraft Noise: Research Update on Selected Topics*, 2008. Available: https://www.noisequest.psu.edu/pdfs-documents/acrpnoise.pdf.

response relationship that defines at what noise level cardiovascular health effects start and what is the rate of increase in response as noise level increases.[49]

Annoyance

Annoyance is a major effect associated with aviation noise. As further described on page 4.7.1-13, the level of annoyance varies considerably from person to person, based on individual tolerance, attitude, and sensitivity, as well as characteristics of the noise and level of activity interference.

On January 13, 2021, the FAA published the analysis results of the Neighborhood Environmental Survey (NES),[50] which was an outcome of a multi-year research effort undertaken to quantify the impacts of aircraft noise exposure on communities around commercial service airports in the U.S. The goal of the research effort was to develop an updated and nationally representative civil aircraft dose-response curve, quantifying the relationship between aircraft noise exposure and community annoyance. To characterize this relationship, the research team designed and conducted the NES, which collected information from a statistically representative number of adult residents living around a balanced sample of 20 U.S. airports — objectively chosen to reflect the nation as a whole.

From the survey data, a national dose-response curve was derived that describes the relationship between aircraft noise exposure (in terms of DNL) and the percentage of individuals reported as being highly annoyed by aircraft noise. Aircraft noise exposure levels were modeled using the FAA Integrated Noise Model (INM), version 7.0d; based on 12-month sets of aircraft flight tracking data collected between 2012 and 2014 for each NES airport. Community response data was collected through a mail survey questionnaire, designed to follow the recommendations of the International Commission on the Biological Effects of Noise (ICBEN), requesting respondents to rank on a scale from 1 to 5 (with 5 being most): "Thinking about the last 12 months or so, when you are here at home, how much does [noise from aircraft] bother, disturb or annoy you?" Responses of either 4 or 5 were then considered as "highly annoyed." Just over 10,000 people completed and returned the mail questionnaire (resulting in a response rate of 40 percent), administered in six separate "waves" over a 12-month period beginning in October 2015. Logistic regression analysis of the "highly-annoyed" responses from the mail questionnaire and their associated aircraft noise exposure levels were used to generate the national dose-response curve. The percentage of those surveyed who were highly annoyed by aircraft noise increased monotonically[51] with increasing noise exposure. In comparison to prior studies on this topic, the NES's national curve shows substantially more people highly annoyed for a given DNL aircraft noise exposure level.

Classroom Disruption

Classroom disruption is an important consideration and the subject of much research. Studies from around the world indicate that vehicle traffic, railroad, and aircraft noise can have adverse effects on reading ability, concentration, motivation, and long-term learning retention. The Draft EIR included an impact assessment of classroom disruption; Section 4.7.1.2.3 describes the methodology of that assessment and results are included in Section 4.7.1.5.3.

Conclusion

The above overview and additional detail in Section 4.7.1.1.3 of the Draft EIR describe that noise or unwanted sound is known to have several adverse effects on humans, such as hearing loss, communication interference, sleep disturbance, physiological responses, and annoyance.

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[49] County of Orange, *Draft Environmental Impact Report No. 617, John Wayne Airport Settlement Agreement Amendment*, (SCH No. 2001111135), Appendix C - Noise Analysis Technical Report, April 2014.

[50] U.S. Department of Transportation, Federal Aviation Administration, *Analysis of the Neighborhood Environmental Survey*, DOT/FAA/TC-21/4, February 2021. Available: https://www.airporttech.tc.faa.gov/Products/Airport-Safety-Papers-Publications/Airport-Safety-Detail/ArtMID/3682/ArticleID/2845/Analysis-of-NES.

[51] Varying in such a way that it either never decreases or never increases.

On January 13, 2021, the FAA published the analysis results of the NES,[52] with a resulting NES national curve showing substantially more people highly annoyed for a given DNL aircraft noise exposure level. The FAA Federal Register Notice, Overview of FAA Aircraft Noise Policy and Research Efforts: Request for Input on Research Activities to Inform Aircraft Noise Policy published on January 13, 2021[53] provided an overview of ongoing research efforts by the FAA to determine the effects of aircraft noise on human health. However, the FAA has not changed its policy and regulations related to the findings of this ongoing research or based on the results of the recently published NES. The FAA has stated: "*The FAA will not make any determinations based on the findings of these research programs for the FAA's noise policies, including any potential revised use of the Day-Night Average Sound Level (DNL) noise metric, until it has carefully considered public and other stakeholder input along with any additional research needed to improve the understanding of the effects of aircraft noise exposure on communities*."[54]

TR-ATMP-N-2: Aircraft Noise Analysis Adequacy and Use of Alternative Metrics

Several commenters proposed the use of supplemental metrics, such as Sound Exposure Level (SEL), as an alternative to Day-Night Average Sound Level (DNL)/ Community Noise Equivalent Level (CNEL). Section 4.7.1.1.2 of the Draft EIR provides an overview of noise descriptors suggested by commenters, including SEL, maximum sound level (L_{max}), and Time Above (TA). One additional metric was requested for assessment by a commenter; Number of Events Above (NA), which is similar to TA, but instead of measuring the length of time above a certain noise level, NA computes the number of events that exceed a given threshold.

The following provides an overview of the regulatory requirements under which the Draft EIR evaluated impacts of aircraft noise and the context surrounding the use of alternative metrics, followed by a review of the use of alternative metrics for assessing aircraft noise impacts in all California Environmental Quality Act (CEQA) documents that have analyzed projects at airports throughout California published in the last ten years.

Federal Requirements

As outlined in Section 4.7.1.3.1.1 of the Draft EIR, *FAA Order 1050.1F, Environmental Impacts: Policies and Procedures*, provides FAA's policies and procedures for evaluating environmental impacts of all agency actions in compliance with the National Environmental Policy Act (NEPA) and the implementing regulations issued by the federal Council on Environmental Quality (CEQ).[55] FAA Order 1050.1F identifies significance thresholds for aircraft noise. These thresholds are based on the annual average daily DNL. In accordance with FAA Order 1050.1F, a proposed action would have a significant noise impact if it would cause a noise-sensitive land use that is already located within the 65 DNL noise contour to experience an increase in noise of DNL 1.5 A-weighted sound pressure level (dBA) or more, or if it would newly expose a noise-sensitive land use to the DNL 65 dBA level due to a DNL 1.5 dBA or greater increase. The Order

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52 U.S. Department of Transportation, Federal Aviation Administration, *Analysis of the Neighborhood Environmental Survey*, DOT/FAA/TC-21/4, February 2021. Available: https://www.airporttech.tc.faa.gov/Products/Airport-Safety-Papers-Publications/Airport-Safety-Detail/ArtMID/3682/ArticleID/2845/Analysis-of-NES.

53 U.S. Department of Transportation, Federal Aviation Administration, *Overview of FAA Aircraft Noise Policy and Research Efforts: Request for Input on Research Activities To Inform Aircraft Noise Policy*, FR Vol 86, No. 8, January 13, 2021. Available: https://www.federalregister.gov/documents/2021/01/13/2021-00564/overview-of-faa-aircraft-noise-policy-and-research-efforts-request-for-input-on-research-activities#print.

54 U.S. Department of Transportation, Federal Aviation Administration, *Overview of FAA Aircraft Noise Policy and Research Efforts: Request for Input on Research Activities To Inform Aircraft Noise Policy*, FR Vol 86, No. 8, January 13, 2021. Available: https://www.federalregister.gov/documents/2021/01/13/2021-00564/overview-of-faa-aircraft-noise-policy-and-research-efforts-request-for-input-on-research-activities#print.

55 U.S. Department of Transportation, Federal Aviation Administration, *Order 1050.1F, Environmental Impacts: Policies and Procedures,* July 16, 2015. Available: https://www.faa.gov/documentLibrary/media/Order/FAA_Order_1050_1F.pdf.

provides for the use of Community Noise Equivalent Level (CNEL) instead of DNL in California.[56] It also requires the use of the FAA-approved model (Aviation Environmental Design Tool [AEDT]) to assess aircraft noise impacts.

FAA Report to Congress

In a report published on April 14, 2020,[57] the FAA responded to the requirement outlined in the FAA Reauthorization Act of 2018, Pub. L. 115-254. In Section 188 of that Act, Congress required that FAA "evaluate alternative noise metrics to current average day-night level standard, such as the use of actual noise sampling to address community airplane noise concerns." In addition, Section 173 of the Act required that FAA complete evaluation of alternative metrics to DNL. FAA's April 2020 report addresses both of those obligations. The April 2020 report provided an overview of the history and purpose of noise evaluation and reviewed metrics used internationally as well as by other state and federal agencies. In the report, FAA assessed the efficacy of DNL and alternative metrics against the requirements set out in the 1979 Aviation Safety and Noise Abatement Act (ASNA).

ASNA required the FAA to establish:

(a) A single system of measuring noise, for which there is a highly reliable relationship between projected noise exposure and surveyed reactions of people to noise, to be uniformly applied in measuring noise at airports and the areas surrounding such airports; and
(b) A single system for determining the exposure of individuals to noise which results from the operations of an airport and which includes, but is not limited to, noise intensity, duration, and time of occurrence.[58]

In the April 2020 report, FAA assessed four groups of noise metrics against ASNA criteria:

- Cumulative metrics (i.e., Level Equivalent [L_{eq}], DNL, and CNEL)
- Single Event metrics (i.e., SEL and L_{max})
- Operational-Acoustic metrics (i.e., NA, TA, and Time Audible)
- Low Acoustic Frequency Noise metrics (i.e., Pounds Per Square Foot [PSF], C-weighted SEL [CSEL], and C-Weighted DNL [CDNL])

FAA found that cumulative metrics, like DNL and CNEL, were best suited to address ASNA criteria as they accounted for noise level (magnitude), time of day, and number of events. No single event, operational-acoustic, or low acoustic frequency noise metric was able to fulfill these requirements; most account only for noise level, apart from number above (NA), which accounts for both noise level and number of events but does not account for time of day.

The conclusion of FAA's report was to continue its recommendation of the use of DNL for FAA decision-making regarding noise compatibility. This is a continuation of the U.S. Federal Interagency Committee on Noise (FICON) decision reached in 1992,[59] that was reaffirmed in 2018 with the successor to FICON, the Federal Interagency Committee on Aviation Noise (FICAN).[60] Additionally, FAA concluded

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56 U.S. Department of Transportation, Federal Aviation Administration, Office of Environment and Energy, *1050.1F Desk Reference*, *Version 2*, "Noise and Noise-Compatible Land Use," p. 11-2, February 2020. https://www.faa.gov/about/office_org/headquarters_offices/apl/environ_policy_guidance/policy/faa_nepa_order/desk_ref/media/desk-ref.pdf.

57 U.S. Department of Transportation, Federal Aviation Administration, *Report to Congress: FAA Reauthorization Act of 2018 (Pub. L. 115-254), Section 188 and Section 173*, April 14, 2020. Available: https://www.faa.gov/about/plans_reports/congress/media/Day-Night_Average_Sound_Levels_COMPLETED_report_w_letters.pdf.

58 49 U.S.C. § 47502(1)(A)(B), (2), (3).

59 Federal Interagency Committee on Noise (FICON), *Federal Agency Review of Selected Airport Noise Analysis Issues*, August 1992. Available: http://gsweventcenter.com/Draft_SEIR_References/1992_08_Federal_Interagency_Committee_on_Noise.pdf.

60 Federal Interagency Committee on Aviation Noise (FICAN), *Research Review of Selected Aviation Noise Issues*, April 2018. Available: https://fican1.files.wordpress.com/2018/04/fican_research_review_2018.pdf.

that supplementary metrics can be useful in supporting further disclosure and to aid in public understanding of community noise effects. However, FAA reaffirmed the recommendation of DNL to meet ASNA requirements that a metric account for noise level, time of day, and number of events.

CEQA and California Guidance

Noise analysis for projects under CEQA focuses on whether the project would result in significant adverse environmental effects. Under CEQA, this assessment entails looking at existing noise levels in the area where the noise impact would occur and determining how large or perceptible any noise increase would be in the given area.

As noted in Section 4.7.1.3.1.2 of the Draft EIR, Title 21 of the California Code of Regulations, Subchapter 6 (also known as the California Airport Noise Standards) defines incompatible noise levels as exposure of nearby communities to noise levels of 65 CNEL or greater. Land use incompatibility is most likely to occur for most types of noise-sensitive uses when they are within the 65 CNEL noise contour. The 65 CNEL standard is also referenced in the California Department of Transportation (Caltrans) California Airport Land Use Planning Handbook (Caltrans Handbook) as the basic limit of acceptable noise levels for residential and other noise-sensitive uses within an urban area.[61] This requirement is based, in part, upon the determination in the Caltrans regulations that 65 dB CNEL is the level of noise which should be acceptable to "...a reasonable person residing in the vicinity of an airport." Airports are responsible for achieving compliance with these regulations. Compliance can be achieved through noise abatement measures, land acquisition, land use conversion, land use restrictions, and/or sound insulation of structures. Airports not in compliance with these regulations can operate under variance procedures established within the regulations.

The State of California also requires that all municipal General Plans contain a Noise Element. The requirements for the Noise Element of the General Plan include describing the noise environment quantitatively using a cumulative noise metric such as CNEL or DNL, establishing noise/land use compatibility criteria, and establishing programs for achieving and/or maintaining compatibility. Noise elements shall address all major noise sources in the community, including mobile and stationary sources.

Review of Airport CEQA Documents

The following presents the findings of a review of all airport CEQA documents published in the last ten years that addressed aircraft noise:

- In all nine of the CEQA documents, CNEL was the primary metric used to evaluate aircraft noise.
- In two documents (San Diego International Airport (SAN) Airport Development Plan (ADP) 2020 EIR and LAX Specific Plan Amendment (SPAS) 2013 EIR), supplemental metrics were used to evaluate sleep disturbance. In these cases, the SEL metric was used to determine whether an increasing portion of the population would have a higher probability of awakening at night based on the Number Above (NA) metric, measuring events exceeding a certain SEL threshold.
- In three documents, including this EIR, the SAN ADP 2020 EIR and the LAX SPAS 2013 EIR, supplemental metrics were used to evaluate disruptions to classroom learning. In all three of these, the TA metric was used to determine whether there was an increase in time at exposure levels at or above certain L_{max} thresholds that would disrupt speech and impact learning. In two of those studies, both at LAX (in the 2013 SPAS EIR and this EIR), the 8-hour L_{eq} metric during school hours (8:00 a.m. and 4:00 p.m.) was used to determine whether there would be impacts due to cumulative noise exposure over the course of the school day that would disrupt learning.

[61] California Department of Transportation, Division of Aeronautics, *California Airport Land Use Planning Handbook*, Section 4.2, Noise, October 2011. Available: https://dot.ca.gov/-/media/dot-media/programs/aeronautics/documents/californiaairportlanduseplanninghandbook-a11y.pdf.

Table 1 provides a list of CEQA documents reviewed and detail on noise metrics evaluated.

Table 1
Summary of CEQA Documents and Noise Metrics Evaluated

EIR Document	Noise Metric(s) Evaluated
LAX: Airfield and Terminal Modernization Project, Draft EIR, 2020	CNEL, TA[1] – Exterior levels 84 dBA or interior levels 55 dBA or above, 8-hour Leq[1] – Interior levels of 35 dBA or above
SJC: Amendment to SJC Master Plan, Final EIR, 2020[3]	CNEL
SAN: Airport Development Plan, Final EIR, 2020[4]	CNEL, SEL[2] – Substantial increase in probability of nighttime awakening, TA[1] – Exterior Levels of 80 dBA or interior levels of 65 dBA or above
MRY: Proposed Airport Master Plan - Vision 2035, Final EIR, 2018[5]	CNEL
SNA: General Aviation Improvement Program, Draft EIR 2018[6]	CNEL
SBA: Master Plan Final EIR, 2017[7]	CNEL
BUR: Replacement Terminal, Final EIR, 2016[8]	CNEL, SEL – For taxiway contours to demonstrate the spatial extent of noise events resulting from potential taxi operations
SNA: John Wayne Airport Settlement Agreement Amendment, Draft EIR, 2014[9]	CNEL, SEL & TA – No significance threshold; metrics included for informational purposes only
LAX: SPAS Master Plan, Final EIR, 2013[10]	CNEL, SEL[2] Substantial increase in probability of nighttime awakening, TA[1] – Exterior levels 84 dBA or interior levels 55 dBA or above, 8-hour Leq[1] – Interior levels of 35 dBA or above

Source: HMMH 2021.

Notes:

1 Used to evaluate potential classroom disruption.

2 Used to evaluate potential sleep disturbance.

3 City of San Jose, *Integrated Final Environmental Impact Report for Amendment to Norman Y. Mineta San Jose International Airport Master Plan*, prepared by David J. Powers & Associates, Inc., April 2020 Available: https://www.sanjoseca.gov/Home/ShowDocument?id=61640.

4 San Diego County Regional Airport Authority, *Final Environmental Impact Report for the San Diego International Airport - Airport Development Plan*, January 2020. Available: https://www.san.org/Airport-Projects/Environmental-Affairs#1245314-adp-final-eir.

5 Monterey Peninsula Airport District, *Final Environmental Impact Report – Monterey Regional Airport Master Plan*, 2018. Available: http://montereyeir.airportstudy.com/environmental-impact-report/.

6 County of Orange, *Draft Program Environmental Impact Report – John Wayne Airport General Aviation Improvement Program*, prepared by Psomas, Landrum & Brown, and Austin Transportation Consulting, 2018. Available: https://files.ocair.com/media/2020-12/DPEIR%20627%20JWA%20GIAP%20FULL%20w%20App_4.pdf?VersionId=n5R1PPnOkCjPNWrYxJ4KuuJL4AQw7dGp.

7 City of Santa Barbara, *Final Program Environmental Impact Report on the Proposed Airport Master Plan,* prepared by Coffman Associates, July 2017. Available: https://www.santabarbaraca.gov/civicax/filebank/blobdload.aspx?BlobID=173401.

8 Burbank-Glendale-Pasadena Airport Authority, *Final Environmental Impact Report for a Replacement Airline Passenger Terminal at Burbank Bob Hope Airport*, prepared by RS&H, 2016. Available: https://elevatebur.com/documents/.

9 County of Orange, *Draft Environmental Impact Report No. 617, John Wayne Airport Settlement Agreement Amendment, Appendix C - Noise Analysis Technical Report*, April 2014.

10 City of Los Angeles, Los Angeles World Airports, *Final Environmental Impact Report for Los Angeles International Airport (LAX) Specific Plan Amendment Study*, Section 4.10.1 – Aircraft Noise, January 2013. Available: https://www.lawa.org/en/lawa-our-lax/environmental-documents/documents-certified/specific-plan-amendment-study/documents.

Berkeley Keep Jets Over the Bay Committee v. Board of Port Commissioners and Implications for Noise Evaluations Under CEQA

In 2001, a California Court of Appeals found that in certain circumstances, noise evaluations performed under CEQA should include, in addition to the 65 dB DNL/CNEL metric, an assessment of single event noise associated with nighttime (10:00 p.m. to 7:00 a.m.) aircraft operations.[62] The City of Oakland's Metropolitan Oakland International Airport's (OAK) EIR for its proposed Airport Development Plan (ADP) was challenged by a citizens group entitled Berkeley Keep Jets Over the Bay Committee.[63] The court concluded that, in light of evidence submitted by commenters concerning the potential for sleep disturbance, the EIR failed to adequately address the noise impacts from proposed nighttime flights. A Supplemental EIR (SEIR) was prepared, submitted for public review and comment, and certified in accordance with CEQA based on a Revised Judgment to:

- Evaluate potential nighttime noise effects by comparing nighttime aircraft activity under normal operating conditions both with and without the ADP in 2010;
- Estimate the increase in the average number of nighttime flights at two or more locations in the cities of Alameda, Berkeley, and San Leandro that could result from the ADP in 2010; and
- Calculate the probability of awakening due to single event noise from a representative sampling of aircraft operations as a result of implementing the ADP.

The analysis uses the sleep disturbance dose-response relationship recommended by the 1997 FICAN for interior sound exposure levels and percent awakening.

Evaluation of Sleep Disturbance

As discussed in Section 4.7.1.1.3 of the Draft EIR, the 1997 FICAN dose response curve (see Figure 4.7.1-3 of the Draft EIR) was an update to the 1992 FICON recommendation, equating SEL to probability of awakening, based on more recent in-home sleep disturbance studies, which showed lower rates of awakening compared to the laboratory studies.[64] The FICAN recommended a curve based on the upper limit of the data presented and, therefore, considered the curve to represent the "maximum percent of the exposed population expected to be behaviorally awakened," or the "maximum awakened." In 2008, FICAN modified its recommendations to include a more recent procedure developed by the American National Standards Institute (ANSI) (ANSI S12.9-2008) for estimating awakenings from nighttime noise, which showed that significantly higher noise levels are required for a population habituated to nighttime noise.[65] However, ANSI S12.9-2008 was withdrawn by the Acoustical Society of America (ASA) in 2018. The review committee concluded that it did not usefully predict transportation-noise-induced sleep disturbance for the following reasons:

- It was based on analysis of a relatively small amount of non-representative information about noise-induced sleep disturbance
- Its predictions of probabilities of "at least one awakening per night" cannot be generalized from one airport to another

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62 *Berkeley Keep Jets Over the Bay Com. v. Board of Port Comrs.* (2001) 92 Cal. App. 4th 1016. Available: https://files.resources.ca.gov/ceqa/cases/2001/berkeley_keep_083001.html.

63 Co-plaintiffs included the City of San Leandro and the City of Alameda.

64 Federal Interagency Committee on Aircraft Noise (FICAN), *Effects of Aviation Noise on Awakenings from Sleep*, June 1997. Available: https://fican1.files.wordpress.com/2015/10/findings_awakenings_1997.pdf.

65 American National Standards Institute (ANSI), *Quantities and Procedures for Description and Measurement of Environmental Sound -- Part 6: Methods for Estimation of Awakenings Associated with Outdoor Noise Events Heard in Homes, ANSI S12.9-2008/Part 6*, 2008.

- The predicted quantity ("at least one awakening per night") did not usefully distinguish degrees of sleep disturbance among preferred and alternate project actions
- Due to lack of cautions in the language of the Standard, its methods were readily misapplied, and its predictions of "at least one awakening per night" were easily over-interpreted
- The standard attempted to characterize an intuitively appealing form of objectively measured sleep disturbance but, in so doing, it failed to acknowledge the many complexities that impact sleep and other forms of sleep disturbance that are known to be sensitive to nighttime noise exposure
- The standard did not quantitatively address the roles of familiarity with noise sources and habituation to noise exposure as determinants of sleep disturbance

The ASA concluded that as of 2018 the method for calculating "at least one behavioral awakening per night" contained in the former ANSI Standard should no longer be relied upon for environmental impact assessment purposes.[66] See Section 4.7.1.1.3 of the Draft EIR for more detail.

Conclusion

The above overview and additional detail on pages 4.7.1-6 through 4.7.1-12 demonstrate that there has been, and still is, considerable debate within the scientific community and a lack of concurrence regarding the relationship between aircraft noise and sleep disturbance, especially as related to determining a definitive noise dose and the response relationship for sleep disturbance. Thus, even if noise events are measured using supplemental metrics (e.g., SEL, L_{max}, TA, etc.), there is no scientific concurrence on the appropriate "threshold" to compare such measurements against, when it comes to sleep disturbance. Additionally, there is presently no applicable regulatory agency that has established standards specific to sleep disturbance impacts for the purpose of CEQA, NEPA, or any other environmental compliance/assessment law. The inconsistency in applying the use of alternative metrics, like those single-event metrics suggested by some commenters, in CEQA documents over the past decade as discussed above is indicative of the lack of applicable regulatory agency and established standards.

Both the DNL noise metric and the CNEL noise metric, described in Section 4.7.1.1.2 of the Draft EIR, incorporate noise "penalties" to account for the increased sensitivity to noise events that occur during the more noise-sensitive nighttime periods such as when most sleeping typically occurs. There are established standards/thresholds that utilize DNL and CNEL as the accepted noise metric in evaluating noise impacts in environmental review documents, such as those under CEQA and NEPA. The FAA's recommendation in its 2020 Report to Congress further supports the use of CNEL in this EIR as it is the noise metric used in determining the significance of aircraft noise impacts associated with the proposed Project (see Section 4.7.1.4). In the absence of any other accepted standards for sleep disturbance, for purposes of this EIR, LAWA used the CNEL metric to address the potential for sleep disturbance impacts due to its application of penalties to noise events occurring during typical sleep hours.

TR-ATMP-T-1: Non-CEQA Transportation Assessment

Numerous comments were received that requested traffic-related level of service (LOS) and congestion analyses be included in the Draft EIR. As discussed in Section 4.8.1 of the Draft EIR, Senate Bill 743 directed the Office of Planning and Research (OPR) to develop revisions to State CEQA Guidelines to establish new criteria for determining the significance of transportation impacts. Subsequent changes to CEQA requirements for transportation impact analyses included elimination of auto delay, traffic level of service (LOS), and other similar measures of vehicular capacity or traffic congestion as a basis for determining

[66] Acoustical Society of America, *Rationale for Withdrawing ANSI/ASA S12.9-2008/Part 6 (A Technical Report prepared by ANSI-Accredited Standards Committee S12 and registered with ANSI*), July 22, 2018.

significant impacts for land use projects and plans in California. The updates to the State CEQA Guidelines establish vehicle miles traveled (VMT) as the primary metric for evaluating a project's environmental impacts on the transportation system. The California Natural Resources Agency adopted the recommended OPR transportation guidelines on December 28, 2018, and amended the State CEQA Guidelines, including Appendix G (Environmental Checklist Form) of the State CEQA Guidelines. Specifically, State CEQA Guidelines, section 15064.3, subdivision (a), states that VMT "is the most appropriate measure of transportation impacts" and, with one exception not applicable here, that "a project's effect on automobile delay shall not constitute a significant environmental impact." These revisions to the State CEQA Guidelines regarding use of the VMT metric instead of LOS were in place prior to issuance of the April 4, 2019 Notice of Preparation (NOP) of the Draft EIR for the LAX Airfield and Terminal Modernization Project. Subsequent to publication of the NOP for the proposed Project, the City of Los Angeles Department of Transportation (LADOT) adopted new Transportation Assessment Guidelines (LADOT's TAG) in July 30, 2019.[67] These Guideline were later updated by LADOT in July 2020.[68] Although the NOP for the proposed Project Draft EIR was published on April 4, 2019, LADOT stated in its comment letter on the Draft EIR (ATMP-AL009) that the transportation analysis in the Draft EIR "appropriately applies" the 2018 revisions to the State CEQA Guidelines establishing VMT as the evaluating metric, rather than LOS. (Please see comment ATMP-AL009-1) The following describes the transportation analysis requirements under the current State CEQA Guidelines, which are also reflected in LADOT's TAG and in LADOT's letter commenting on the Draft EIR.

As described in Section 4.8.2 of the Draft EIR, to evaluate transportation impacts, trip generation and VMT were determined for passengers and employees. As explained in Section 4.8.4 of the Draft EIR, the following thresholds of significance were used to assess the transportation impacts of the proposed Project in accordance with the State CEQA Guidelines:

- **Threshold 4.8-1:** Conflict with a program, plan, ordinance, or policy addressing the circulation system (including transit, roadways, bicycle, and pedestrian facilities) that was adopted to protect the environment.
- **Threshold 4.8-2:** Generate VMT per employee exceeding 15 percent below the Projected Future Conditions Baseline (2028) VMT per employee. This threshold only applied to VMT associated with commute trips by workers employed at LAX. The Projected Future Conditions Baseline (2028) VMT per employee is 24.0. Therefore, the threshold for VMT per employee is 20.4.
- **Threshold 4.8-3:** Increase total passenger VMT over the Projected Future Conditions Baseline (2028). This threshold only applies to VMT generated by passengers at LAX.
- **Threshold 4.8-4:** Induce substantial additional VMT compared to the Projected Future Conditions Baseline (2028).
- **Threshold 4.8-5:** Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses.

The 15 percent reduction from the baseline for employee VMT is consistent with LADOT impact criteria for office development projects (page 2-6 of LADOT TAG) and OPR's recommendation ("OPR recommends that a per capita or per employee VMT that is fifteen percent below that of existing development may be a reasonable threshold."[69]).

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[67] City of Los Angeles, Department of Transportation, *Los Angeles Department of Transportation (LADOT) Transportation Assessment Guidelines*, July 2019. Available: http://ladot.lacity.org/sites/default/files/documents/ta_guidelines_-20190731_0.pdf.

[68] City *of* Los Angeles, Department of Transportation, *Los Angeles Department of Transportation (LADOT) Transportation Assessment Guidelines*, July 2020. Available: https://ladot.lacity.org/sites/default/files/2020-07/ta_guidelines_all-sections_2020.07.04_attachments.pdf.

[69] State of California, Governor's Office of Planning and Research, *Technical Advisory on Evaluating Transportation Impacts in CEQA*, page 10, December 2018. Available: http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf.

In summary, several commenters request additional analysis or inclusion of analysis of traffic-related LOS, congestion, and delay on surrounding roadways; however, based on State and local requirements, LOS, congestion, and delay impacts are no longer considered impacts on the environment and, therefore, are not addressed in the Draft EIR.

Notwithstanding the above, the LADOT Transportation Assessment Guidelines includes a separate set of guidelines for evaluating transportation impacts outside of the CEQA process. Such guidelines are set forth in the "Non-CEQA Transportation Analysis" portion of the TAG,[70] which requires the following:

- **Pedestrian, Bicycle, and Transit Assessment:** This analysis is aimed at determining a project's potential effect on pedestrian, bicycle, and transit facilities in the vicinity of a proposed project. The analysis includes an inventory of existing facilities, as well as an evaluation utilizing criteria provided in the LADOT TAG.
- **Project Access, Safety, and Circulation Evaluation:** This analysis covers intersection operations, roadway design and collision history, and passenger loading in line with the evaluation methodologies and criteria provided in the LADOT TAG.
- **Project Construction Analysis:** This analysis addresses activities associated with project construction relative to temporary transportation constraints, temporary loss of access, and temporary impacts to transit.

A Non-CEQA Transportation Assessment was completed in April 2021 for the proposed Project, in accordance with criteria and methodologies provided in the LADOT Transportation Assessment Guidelines. The Non-CEQA Transportation Assessment Report is available at https://www.lawa.org/atmp/documents. LAWA worked closely with LADOT on this report and recommendations. Although there is no requirement for public review and comment on the Non-CEQA Transportation Assessment, LAWA provided an approximately month-long period for members of the public to provide comments.

TR-ATMP-T-2: Transportation Mitigation and Monitoring

Introduction

This topical response addresses comments on the Draft EIR regarding the mitigation of transportation impacts. Numerous comments on the Draft EIR requested specific transportation-related mitigation measures. In addition, several commenters expressed concern regarding the effectiveness of the transportation mitigation measures proposed in the Draft EIR and requested expanded mitigation monitoring. The following topical response describes the transportation mitigation proposed in the Draft EIR, and then addresses the common elements of various comments received on these issues. For individual comments where additional concerns were raised that are not covered in this topical response, additional information is provided in the individual responses to address those specific concerns.

Description of the Transportation Impacts and Mitigation

As explained in Section 4.8.1 of the Draft EIR and in Topical Response TR-ATMP-T-1, Senate Bill (SB) 743 directed the Office of Planning and Research (OPR) to develop revisions to the State CEQA Guidelines to establish new criteria for determining the significance of transportation impacts and define alternative metrics for traffic level of service (LOS). Subsequent changes to CEQA requirements for transportation impact analyses included elimination of auto delay, LOS, and other similar measures of vehicular capacity

[70] City of Los Angeles, Department of Transportation, *Los Angeles Department of Transportation (LADOT) Transportation Assessment Guidelines*, Section 3, Page 3-1, July 2020. Available: https://ladot.lacity.org/sites/default/files/2020-07/ta_guidelines_all-sections_2020.07.04_attachments.pdf.

or traffic congestion as a basis for determining significant impacts for land use projects and plans in California. Further, parking impacts are not considered significant impacts on the environment for particular types of development projects within certain infill areas with nearby frequent transit service.

The updates to the State CEQA Guidelines establish vehicle miles traveled (VMT) as the primary metric for evaluating a project's environmental impacts on the transportation system. As described in Section 4.8.2 of the Draft EIR, to evaluate transportation impacts, trip generation and VMT were determined for passengers and employees. In addition, the short-term and long-term induced VMT related to the proposed Project was included in the Draft EIR. As discussed in Section 4.8.5.2.2 of the Draft EIR, a VMT Reduction Program (Mitigation Measure MM-T (ATMP)-1) was designed to address all three types of VMT—employee VMT, passenger VMT, and induced VMT—through a single comprehensive program. Implementation of the VMT Reduction Program would occur not later than initial operation of Concourse 0 or Terminal 9, whichever is operational first, and includes the following primary strategies.

1. **Expand LAWA's Rideshare Program** to all LAX employees, which includes the vanpool program, carpool matching, transit trip planning, and a guaranteed ride home program, which is expected to produce a similar mode share for rideshare programs as seen in the highly successful program for LAWA employees.
2. **Through the LAX Transportation Management Organization, Work with Employers on an Employee Telecommuting Program.** The LAX Transportation Management Organization will encourage and provide support, advice, and guidance to employers across the LAX campus in implementing telecommuting programs.
3. **Provide On-demand Micro-Transit Shuttle Service** through coordination with Metro and other entities to expand pilot programs, such as those of Metro, to full programs, and to seek partnerships to develop new programs such as the recent establishment of an LAX employee shuttle in partnership with the City of Inglewood.
4. **Market and Promote Alternative Transportation Options** for travel to and from LAX using modes other than a private vehicle and/or single occupants in vehicles. For employees, there is opportunity through LAWA's Rideshare program and the LAX Transportation Management Organization to increase the frequency and diversify the format of marketing and promotions to LAWA employees, increase the number of LAX employees that receive marketing and promotions communications through the expansion of the Rideshare program, and enhance the relevance of existing sources of information such as online trip-planning tools. For passengers, there are online trip-planning tools, such as Google Maps and Metro's trip planner, that offer ways for a passenger to get to LAX via public transit or alternative modes.

Section 4.8.5.2.2 of the Draft EIR also contains the following additional strategies that could be implemented, should future monitoring determine that the aforementioned four strategies are not effective at reducing VMT to the levels stated in the Draft EIR:

- **Conduct Parking Study and Price Parking to Reduce VMT** by identifying opportunities to price employee parking and passenger parking such that VMT reduction is achieved, taking into consideration the prevalence of a widespread off-campus, competitive parking market.
- **Expand Incentives and Commuter Benefits** by providing enhanced commuter incentives, including expanded carpool benefits, transit subsidies, guaranteed ride home, and vanpool support to LAWA employees, by coordinating with other LAX employers that have such incentives and benefits to encourage the expansion of those programs.
- **Evaluate Modifications to FlyAway Service** relative to the potential to reach new geographical areas where potential ridership would support establishment of a route to such areas and implement such routes if determined feasible.

- **Explore Incentive Measures from LAWA Mobility Strategic Plan** such as partnering with airlines to explore integrated ticketing solutions for airline and transit tickets as a potential means to incentivize the use of transit, and partnering with the Transportation Security Administration (TSA) to explore expedited security screening for FlyAway passengers and other transit customers as a potential means to incentivize the use of transit.
- **Evaluate the Potential for Congestion Pricing in the Central Terminal Area (CTA)**

In light of comments received on the Draft EIR, certain additions and clarifications have been made to the Draft EIR's description of potential VMT reduction strategies, which are presented above. Such changes reflect the fact that LAWA's Rideshare Program includes more than just vanpools (i.e., the Draft EIR's description of the VMT reduction strategy to Expand LAWA's Rideshare Program noted only the need to provide additional vans to meet increased demands as LAWA's Rideshare Program is expanded to other employers at LAX, but, as described above, the Rideshare Program includes many other features such as carpool matching, transit trip planning, and a guaranteed ride home program). Also, with regard to the Draft EIR's description of the VMT reduction strategy to "Formalize the Employee Telecommuting Program," the above discussion clarifies that implementation of that strategy would occur through the LAX Transportation Management Organization (TMO), working with different employers at LAX. The LAX TMO would also be involved in the VMT reduction strategy of marketing and promoting alternative transportation options. Please see Chapter F3, *Corrections and Clarifications to the Draft EIR*, regarding incorporation of these changes into the Final EIR.

With the implementation of Mitigation Measure MM-T (ATMP)-1, VMT Reduction Program, the VMT impact findings are summarized below:

- As explained in Impact 4.8-2, the proposed Project would generate VMT per employee exceeding the 15 percent below the Projected Future Conditions Baseline (2028) VMT per employee threshold (i.e., 20.4). This would be a *significant impact*. With mitigation, the impact would be *less than significant.*
- As explained in Impact 4.8-3, the proposed Project would result in a net increase of 32,786 total passenger VMT over the Projected Future Conditions Baseline (2028). This would be a *significant impact*. Even with mitigation, this would remain a *significant and unavoidable impact.*
- As explained in Impact 4.8-4, the proposed Project would induce an additional 18,220 VMT compared to the Projected Future Conditions Baseline (2028). This would be a *significant impact*. There are no feasible mitigation measures to address this impact. As such, it would be a *significant and unavoidable impact.*

Effectiveness of Transportation Mitigation

Several comments expressed concern regarding the effectiveness of the measures included in Mitigation Measure MM-T (ATMP)-1, VMT Reduction Program. As described in Section 4.8.5.2.2 of the Draft EIR, several potential VMT reduction strategies are proposed for reducing VMT impacts associated with the proposed Project – see MM-T (ATMP)-1, VMT Reduction Program. The four primary VMT reduction strategies referred to earlier are proven measures with published research about the effectiveness of each of those strategies, and also take into account LAWA's own experience regarding such VMT reduction measures at LAX. The following describes the VMT reduction effectiveness anticipated for each of the four main strategies.

- **Expand LAWA's Rideshare Program** – As described on pages 4.8-52 and 4.5-53 of the Draft DEIR, the expansion of LAWA's rideshare program is expected to increase the LAX employee commute

mode share for vanpools from 5.5 percent[71] to 7.9 percent by expanding the LAWA program to all LAX employees, with a corresponding expansion of fleet size to meet the increased demand. For example, LAWA's Rideshare Program includes an extensive vanpool program. Currently, LAWA has a fleet of 72 vehicles which would be marketed to the entire LAX employee pool and expanded as needed. Other rideshare programs include carpool matching, transit trip planning and guaranteed ride home programs. All of these programs will enable a shift from employees driving alone to employees driving with others or taking alternate commute modes. The total VMT reduction from this strategy is estimated to be over 60,000 daily employee VMT.

- **Through the LAX Transportation Management Organization, Work with Employers on an Employee Telecommuting Program** – As described on page 4.8-53 of the Draft EIR, approximately four percent of all jobs across LAX could be completed at least partially from home. Based on research related to telecommute programs, a telecommute program that enables an average of 1.5 days per week to be spent working from home, with a four percent eligibility, would result in a 0.88 percent reduction in VMT from the employment site[72] which equates to over 7,000 daily employee VMT.
- **Provide On-demand Micro-Transit Shuttle** – As described on pages 4.8-53 and 4.8-54 of the Draft EIR, the expansion of on-demand micro-transit shuttles would result in additional reduction of single-occupancy trips to LAX. LAWA is currently providing funding and partnering with the City of Inglewood to operate an on-demand micro-transit shuttle service for LAX employees who live in the City of Inglewood and in Lennox. Further, LAWA has worked closely with Metro on their pilot on-demand shuttle service to ensure that it serves the LAX campus. These pilot programs serve as examples of service options that can be expanded into permanent programs, or can be used to create on-demand micro-transit shuttle service to LAX from new nearby geographic areas. Based on research related to private employee shuttles serving employment centers, an estimated 27 percent of employees within the service area who would have driven alone would switch to a shuttle if it existed.[73] This equates to a total VMT reduction for the nine percent of LAX employees that live within five miles of the airport of over 4,700 daily employee VMT. Further expanding the service area would result in an additional VMT reduction for employees.
- **Market and Promote Alternative Transportation Options** – As described on page 4.8-54, promoting alternative options to get to and from LAX using modes other than a private vehicle would further reduce employee VMT. While LAWA currently engages in marketing and promoting alternative options to get to LAX using modes other than a private vehicle through its Rideshare program, there is opportunity to increase the frequency and diversify the format of marketing and promotions to LAWA employees, increase the number of LAX employees that receive marketing and promotions communications through the expansion of the Rideshare program, and enhance the relevance of existing sources of information such as online trip-planning tools. The VMT reduction potential from this strategy is grouped with the expansion of the rideshare program based on available research,[74] and no additional VMT reductions are assumed to be produced from this strategy in isolation. This strategy can also be expanded to LAX passengers to reduce passenger VMT. Currently, passengers need to proactively seek out online trip-planning

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71 City of Los Angeles, Los Angeles World Airports, *Employee Travel Study of Los Angeles International Airport*, prepared by Point C, updated July 2016. LAX employee vanpool mode share was reported to be 5.5%.

72 Cambridge Systematics, *Moving Cooler: An Analysis of Transportation Strategies for Reducing Greenhouse Gas Emissions,* Technical Appendices, prepared for the Urban Land Institute (p. B-54). As reported in the California Air Pollution Control Officers Association, *Quantifying Greenhouse Gas Mitigation Measures*, page 237, 2010. Available: http://capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf.

73 Handy, Lovejoy, Boarnet, Spears, *Impacts of Transit Service Strategies on Passenger Vehicle Use and Greenhouse Gas Emissions,* 2013.

74 California Air Pollution Control Officers Association, *Quantifying Greenhouse Gas Mitigation Measures,* page 242, 2010. Available: http://capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf.

tools, such as Google Maps and Metro's trip planner, to find ways to get to LAX via public transit or alternative modes. Through expanded promotions and marketing that capture passengers' attention at all stages of the trip-making process, in conjunction with the increasing availability of non-auto options to get to LAX in the future, passenger VMT is anticipated to be reduced. No data is available on the magnitude of such a reduction in an airport setting. For this reason, the reduction in VMT from such a program cannot be quantified. Nonetheless, such a program would serve to reduce passenger VMT.

In addition to the four primary VMT reduction strategies, pages 4.8-54 and 4.8-55 of the Draft EIR provide additional VMT reduction strategies that may be implemented. As explained, the effectiveness of these strategies to reduce VMT is difficult to estimate at this time due to the lack of available research or data. However, these additional VMT reduction strategies are included as part of MM-T (ATMP)-1, VMT Reduction Program, because, as a matter of professional judgment, they appear to have the potential to result in further decreases in VMT, even if there is insufficient data or research to quantify that decrease. Regardless, the actual effectiveness of the VMT reduction strategies selected for implementation would be validated through annual monitoring and reporting, as further described below.

Based on the anticipated effectiveness of the above-mentioned VMT reduction strategies, the following summarizes the ability of the strategies to mitigate each of the three types of VMT impacts addressed in the Draft EIR.

- **Ability of Strategies to Mitigate Employment VMT Impact:** The employment VMT mitigation requirement will be considered to be fully satisfied if, at buildout of Concourse 0 and Terminal 9, airport-wide employment VMT is reduced by 16,450 daily VMT, which is equivalent to meeting a performance goal of 20.4 VMT per employee associated with the proposed Project. Based on the strategies available for employment VMT, LAWA's ability to control, monitor, and report on the implementation of such strategies, and LAWA's ability to augment the program with additional strategies as needed, it is anticipated that the employment VMT impacts associated with the proposed Project would be reduced to a level that is *less than significant*.
- **Ability of Strategies to Mitigate Passenger VMT Impact:** Unlike employment VMT, the available strategies for reducing passenger VMT are limited, are not within the control of LAWA, and are more difficult to monitor and report. The VMT reduction strategies related to passengers are primarily incentive-based, with no research available on the application of these strategies in an airport context, no certainty as to their effectiveness in reducing VMT, and limited opportunity to document or demonstrate their ability to reduce passenger VMT. As explained above, the Project is expected to result in a net increase of passenger-related 32,786 VMT per day, as compared to Projected Future Conditions Baseline (2028). The significance threshold is "no net increase in passenger-related VMT." Thus, in order to avoid this impact, LAWA would have to implement programs that would result in a reduction of 32,786 VMT per day. Given the limitations of the research and strategies to reduce passenger VMT, the passenger VMT impact associated with the proposed Project would be *significant and unavoidable*. LAWA would nevertheless implement those strategies listed above that are designed to reduce passenger VMT.
- **Ability of Strategies to Mitigate Induced VMT Impact:** LAWA has not identified any potentially feasible mitigation measures to substantially lessen or avoid induced VMT. Induced VMT occurs on surface roads that are outside of LAWA's control and involve persons who are not traveling to or from LAX. Induced VMT refers to VMT that is unrelated to airport operations but related to the improved roadway operations on nearby surface streets as a result of the roadway improvements that are part of the proposed Project. LAWA does not have the authority or ability to regulate such travel. In addition, LAWA has not identified a measure that would prevent or discourage such travelers. Induced VMT can be addressed only on a regional scale, through long-term land use

changes and major transit investments. As such, the induced VMT impact associated with the proposed Project would be *significant and unavoidable*.

VMT Reduction Strategies Suggested by Commenters

A number of comments received on the Draft EIR identified VMT reduction strategies that the commenters stated should be required or at least considered for the proposed Project. In many cases, the VMT reduction strategies identified in the comments were previously considered by LAWA and were determined to be infeasible, are a variation of strategies that are already recommended for the proposed Project in the Draft EIR, or are already being implemented at LAX. In cases where a VMT reduction strategy identified by a commenter was not already included in the Draft EIR and such a strategy(s) would be feasible, or potentially feasible subject to further evaluation, that strategy has been added to Mitigation Measure MM-T(ATMP)-1 as part of the Final EIR. **Table 1** below lists the VMT reduction strategies identified in comments on the Draft EIR, along with an indication of whether the recommended strategies are already included, in whole or in part, within the Draft EIR. For strategies that were not included in the Draft EIR, the table provides an explanation as to why it was not included.

Mitigation Monitoring Program

As part of Mitigation Measure MM-T (ATMP)-1, and as described in the Draft EIR, in conjunction with the selection and implementation of VMT reduction strategies, LAWA shall implement an annual monitoring and reporting process to validate the level of LAX employee VMT reduction attained each year. In the event the resultant VMT per employee or VMT equivalent for the reporting year is greater than 20.4, adjustments to the existing VMT reduction strategies or additional VMT reduction strategies shall be implemented. The annual monitoring shall also report on the reductions associated with passenger VMT, as accomplished through reduction strategies that apply to passenger VMT.

In the event that the amount of employee VMT reduction for the reporting year exceeds the amount required to mitigate the employee VMT impact, the excess reduction (VMT reduction above and beyond the level of reduction needed to achieve the employee VMT performance goal of 20.4 VMT per employees) can be credited toward reduction of the passenger VMT impact.

Monitoring and reporting on the effectiveness of the VMT reduction strategies would occur on an annual basis, beginning one year after initial operation of Concourse 0 or Terminal 9, whichever is operational first. The annual monitoring shall be such that, if the VMT per employee performance goal of 20.4 or VMT equivalent is achieved for five consecutive years, the VMT mitigation requirement for the proposed Project will be considered to have been achieved (Note: The Draft EIR indicates that the VMT employee performance goal would be considered achieved if it is met for three consecutive years; however, that period has been extended to five consecutive years – please see Chapter F3, *Corrections and Clarifications to the Draft EIR*. This extension would serve to further confirm that LAWA has achieved the identified target for reducing employee VMT).

Table 1
VMT Reduction Strategies

Source of Comment Suggesting VMT Reduction Strategy	Description of VMT Reduction Strategy	Is VMT Reduction Strategy Already Included in the Draft EIR?	Response
City of Manhattan Beach (ATMP-AL006-18)	Annual monitoring of VMT reduction strategies should continue through 2045 to align with the regional aviation activity forecast and to provide assurance to the neighboring communities that project related VMT impacts will remain a priority in the long term	No	The duration of the VMT monitoring program is indicated in Section 4.8.5.2.2 of the Draft EIR as being for a period of three years of sustained VMT reduction from the applicable Project employment VMT baseline. LAWA has subsequently revised the Final EIR to extend that period to five years of sustained VMT reduction as reflected in Chapter F3, *Corrections and Clarifications to the Draft EIR*. That monitoring duration is considered sufficient to demonstrate the efficacy of the VMT reduction measures being implemented. As such, it is unnecessary to extend the VMT reduction monitoring period through 2045.
Los Angeles City Council District 11 (ATMP-AL008-5)	Reduce fares for FlyAway and transit serving LAX. Fare reductions should be automatic if/when VMT target is not met.	No	Per federal regulations, LAWA cannot subsidize public transit fares for regular mass transit service. The FlyAway service is continually evolving based on demand, ridership, and cost. Over time the routes may change to focus on areas where potential ridership is greater. Also, technology associated with operations continues to evolve, such as the ability of apps to provide real-time information of when the bus will arrive at pick-up and drop-off locations, and other such passenger conveniences to help improve ridership.
Los Angeles City Council District 11 (ATMP-AL008-6)	Work with operators to improve transit service	Yes	As described in Section 4.8.5.2.2, LAWA is coordinating with Metro regarding Metro's micro-transit shuttle program. LAWA will coordinate with transit providers to help market and promote services to LAX, recognizing that only the transit providers have the ability to modify transit services and LAWA's coordination with transit providers can focus only on improved services that are specific to LAX riders. This would be accomplished as part of the Market and Promote Alternative Transportation Options VMT reduction strategy described in Section 4.8.5.2.2 of the Draft EIR.
Los Angeles City Council District 11 (ATMP-AL008-7)	Establish curbside management to encourage pick-up outside CTA and with future people mover	No	The LAX Landside Access Modernization Program has already committed to improving pick-up and drop-off options at LAX with new facilities outside the CTA such as the Intermodal Transportation Facility (ITF) West and ITF East stations of the Automated People Mover (APM). As such, this existing commitment cannot be a new additional mitigation measure for the LAX Airfield and Terminal Modernization Project. It should be noted, however, that the proposed Project includes a new APM station at Terminal 9 and an elevated corridor that would provide passengers at Concourse 0 with access to the CTA East APM station, which would serve to encourage the use of the APM.

Table 1
VMT Reduction Strategies

Source of Comment Suggesting VMT Reduction Strategy	Description of VMT Reduction Strategy	Is VMT Reduction Strategy Already Included in the Draft EIR?	Response
Los Angeles City Council District 11 (ATMP-AL008-8)	Build additional bus-only lanes that feed into the for CTA and the LAX Landside Access Modernization Program area	No	In coordination with the LAX Landside Access Modernization Program, Metro is developing the Airport Metro Connector (AMC) station at Aviation Boulevard/96th Street, which will be a major multi-modal transportation center with a connection to the LAX APM system (see https://www.metro.net/projects/lax-extension/). Metro and other municipal bus operators are updating their bus routes/operations in the LAX area in light of the future AMC. The addition of the AMC station will help provide an efficient connection to the LAX APM for passenger and employee access to and from the CTA without having municipal buses travel on local streets to drop off passengers near the CTA. Terminal facilities proposed as part of the LAX Airfield and Terminal Modernization Project (Concourse 0 and Terminal 9) will be accessible from the LAX APM. It should also be noted that LAWA cannot build or fund bus lanes that serve the general public, as that is prohibited under federal requirements related to revenue diversion.
Los Angeles City Council District 11 (ATMP-AL008-9)	Expand coverage area and scope of Transportation Management Organization (TMO) to include office buildings in Westchester, Playa del Rey, El Segundo	No	LAWA's establishment of a TMO is already a requirement of the LAX Landside Access Modernization Program; therefore, it cannot be credited as a mitigation measure for the LAX Airfield and Terminal Modernization Project. LAWA has implemented a TMO for LAX employees and has been working with and will continue to collaborate with existing transportation management programs adjacent to LAX.
Los Angeles City Council District 11 (ATMP-AL008-10)	Commit to a robust mitigation monitoring and reporting of employee VMT and passenger VMT, and monitor and manage airport traffic through the operational life of the project	Yes	LAWA's commitment to monitor and manage traffic at LAX has been ongoing for several decades and is anticipated to continue into the foreseeable future. LAWA agrees with the commenter regarding the importance of a robust mitigation monitoring and reporting program. In the Draft EIR (page 4.8-57), LAWA committed to monitoring and reporting of the effectiveness of the employee VMT reduction strategies annually until the target was reached for three consecutive years. LAWA has subsequently revised the Draft EIR to extend that period to five years of sustained VMT reduction – please see Chapter F3, *Corrections and Clarifications to the Draft EIR*.
City of Los Angeles Department of Transportation (ATMP-AL009-3)	In evaluating potential future modifications to the FlyAway program, consider expanding the geographic reach of the service and explore incentives that can increase ridership.	Yes	The recommendation to expand the geographic reach of FlyAway service to increase ridership is included in Mitigation Measure MM-T (ATMP)-1 of the Draft EIR on page 4.8-55.

Table 1
VMT Reduction Strategies

Source of Comment Suggesting VMT Reduction Strategy	Description of VMT Reduction Strategy	Is VMT Reduction Strategy Already Included in the Draft EIR?	Response
City of Los Angeles Department of Transportation (ATMP-AL009-4 to 9)	LAWA should collaborate with LADOT during construction to develop VMT reduction program that includes: ▪ Transit system enhancements ▪ Evaluate curbside management strategies ▪ Consider emerging technologies ▪ Explore expansion of LAX TMO service area ▪ Explore use of big data and digital platforms	Yes	Several of the VMT reduction strategies presented in the Draft EIR include elements or certain aspects of the strategies suggested by LADOT. While LAWA has no control over and cannot fund public transit improvements, as part of the TMO, LAWA will explore options to incentivize employees to take alternate commute options and will explore strategies to work with stakeholders such as airlines, to promote mass transit or FlyAway transit options for their passengers. As noted above, the LAX Landside Access Modernization Program has already committed to improving pick-up and drop-off options at LAX and facilities outside of the CTA such as the ITF West and ITF East stations of the APM. LAWA has already started to implement new technologies as part of its Ground Transportation Management System, such as the Mobility Data Specification Platform (MDS). MDS will enable comprehensive and standardized two-way digital communications between LAWA and commercial fleet companies operating at LAX. In addition, LAWA is currently preparing a Request for Proposals (RFP) for a new FlyAway service contract that will include consideration and incorporation of emerging technologies, such as a technology platform that provides booking, payment, and real time arrival information as well as a back-end data dashboard that provides dynamic updates on FlyAway operations. It is anticipated that the RFP will be released in August or September 2021. Similarly, the use of new technologies, data collection, and analysis will assist in evaluating FlyAway service areas and refining the routes to improve ridership.

Table 1
VMT Reduction Strategies

Source of Comment Suggesting VMT Reduction Strategy	Description of VMT Reduction Strategy	Is VMT Reduction Strategy Already Included in the Draft EIR?	Response
Law Office of Shute, Mihaly & Weinberger on behalf of City of El Segundo (ATMP-AL010-113)	The portion of MM-T (ATMP)-1 that calls for LAWA to provide enhanced commuter incentives, could be strengthened —and made enforceable — by requiring that LAWA offer financial incentives for its employees (e.g., a monthly pre-tax deduction to pay for transit or vanpool expenses) that provides financial incentives to encourage employees to bike, take transit, and carpool to work.	Yes	As indicated in Section 4.8.5.2.2 of the Draft EIR, the expanded incentives and commuter benefits for LAWA employees and other LAX employers in Mitigation Measure MM-T (ATMP)-1 are included as additional strategies that could be implemented by LAWA to reduce VMT. The Draft EIR identifies the specific, quantifiable target that the program must achieve in order to avoid a significant impact with respect to employee VMT. The list of additional strategies included in the Draft EIR was not used to calculate the anticipated reduction in airport-wide employment VMT of more than 16,450 daily VMT. Rather, the list of strategies serves as a menu of approaches that can be used in order to achieve the identified target. Because the employee incentives and benefits proposal is one of several strategies on this menu, it is not necessary to identify the specific level of incentives or benefits that would be provided. Rather, the commitment is to achieve the identified reduction in employee VMT, and the employee incentive/benefit is one of several means of attaining it. Providing additional details regarding how this strategy would be implemented at this time would not change the conclusion of the Draft EIR. LAX is committed to reducing employee VMT, as described on pages 4.8-56 and 4.8-57 of the Draft EIR, and the annual monitoring reports prepared once either Concourse 0 or Terminal 9 becomes operational would include a full list and description of the incentives and commuter benefits that were offered in the preceding year and the VMT per employee.
Law Office of Shute, Mihaly & Weinberger on behalf of City of El Segundo (ATMP-AL010-116 and 229)	Micro-transit shuttle should include El Segundo as well	Yes	As discussed on pages 4.8-53 and 4.8-54 of the Draft EIR, the intent of the on-demand micro-transit shuttle service is to provide an alternative transportation option to the automobile for both employees and passengers of LAX. Future on-demand micro-transit service will take into account potential ridership, service areas, density, and other planning tools. El Segundo could, along with other communities in the general vicinity of LAX, be considered based on these criteria.
Law Office of Shute, Mihaly & Weinberger on behalf of City of El Segundo (ATMP-AL010-230)	Suggesting improved bike network particularly for access from El Segundo to LAX	No	LAWA does not have jurisdiction over bicycle facilities outside of the City of Los Angeles, which includes having no authority to build bicycle facilities in the City of El Segundo. For this reason, the proposal to expand the network of bike facilities located in the City of El Segundo is infeasible. It should be noted, however, that the LAX Landside Access Modernization Program includes expansion of, and improvements to, the bicycle network that connects with the existing bike path along Aviation Boulevard. The LAX Landside Access Modernization Project also includes the APM providing access to the CTA from the ITF West and ITF East, which provides connections to regional transit and regional bike networks.

Table 1
VMT Reduction Strategies

Source of Comment Suggesting VMT Reduction Strategy	Description of VMT Reduction Strategy	Is VMT Reduction Strategy Already Included in the Draft EIR?	Response
Law Office of Shute, Mihaly & Weinberger on behalf of City of El Segundo (ATMP-AL010-112)	Provide additional information regarding existing ride-share program and opportunities for expansion	Yes	Such information would be developed, updated, and refined as part of ongoing implementation of the Expand LAWA's Rideshare Program measure described on page 4.8-52 of the Draft EIR.
Law Office of Shute, Mihaly & Weinberger on behalf of City of El Segundo (ATMP-AL010-114)	Provide additional information regarding study to price parking to reduce VMT; commit to increase price of parking until identified VMT reductions are achieved.	Yes	Conducting a study to price parking to reduce VMT is noted on pages 4.8-54 and 4.8-55 of the Draft EIR as an additional VMT reduction strategy. As indicated therein, the study would need to take into account the prevalence of widespread off-campus parking facilities that operate within a competitive parking market in order to determine what on-campus price points would deter passengers and employees from driving, rather than simply pushing them to use off-campus options. Based on the outcome and findings of the study, LAWA would commit to parking price changes if feasible and needed for additional VMT reductions.
Law Office of Shute, Mihaly & Weinberger on behalf of City of El Segundo (ATMP-AL010-115)	Commit to modifications and expansion of FlyAway bus service	Yes	That suggestion is already covered by the FlyAway measure presented on page 4.8-55 of the Draft EIR.
Law Office of Shute, Mihaly & Weinberger on behalf of City of El Segundo (ATMP-AL010-117)	LAWA should install bus stop improvements within El Segundo. EIR should add collaboration between LAWA and El Segundo to improve active stops, focusing on safety and convenience	No	LAWA has no jurisdiction or authority to make improvements within the City of El Segundo. For this reason, the proposal for LAWA to install bus stop improvements within El Segundo is infeasible. As part of the VMT reduction strategy presented in Section 4.8.5.2.2 of the Draft EIR to market and promote alternative transportation options, LAWA will collaborate with El Segundo on ideas to improve active stops that serve LAX in the interest of reducing LAX employee and passenger VMT.
Law Office of Gideon Kracov on behalf of USWW and UNITE HERE Local 11 (ATMP-PC035-37 and 55)	1. Offsite van pools, 2. neighborhood shuttles, 3. expand public transit, 4. public transit subsidies, 5. bike share/car share, 6. advertising,	1. Yes 2. Yes 3. No 4. Yes 5. Indirectly 6. Yes	1. See pages 4.8-52 and 4.8-53 of the Draft EIR regarding expansion of LAX Rideshare Program, which includes vanpools. 2. See pages 4.8-53 4.8-54 of the Draft EIR regarding on-demand micro-transit shuttles. 3. LAWA has no authority or ability to expand public transit; however, as part of the market and promote alternative transportation options described on page 4.8-54 of the Draft EIR, LAWA will coordinate with

Table 1
VMT Reduction Strategies

Source of Comment Suggesting VMT Reduction Strategy	Description of VMT Reduction Strategy	Is VMT Reduction Strategy Already Included in the Draft EIR?	Response
	7. Pedestrian network improvements, 8. on site traffic calming, 9. protected bike lanes, 10. cycle tracks or separated trails, 11. bike storage and other non-automotive improvements.	7. No 8. No 9. No 10. No 11. No	public transit providers on ideas to encourage the use of public transit by LAX employees and passengers, especially in light of the new transportation facilities being developed near LAX (i.e., the AMC and LAX Landside Access Modernization Program facilities). 4. See page 4.8-55 of the Draft EIR regarding transit subsidies for LAX employees. 5. Expanding LAWA's Rideshare Program, as described on pages 4.8-52 and 4.8-53 of the Draft EIR, would allow for bike sharing and car sharing comparable to how carpooling reduces single occupancy vehicle trips. 6. See page 4.8-54 of the Draft EIR, which includes advertising as a means to market and promote alternative transportation options. 7. Improvements to the pedestrian and bikeway network in the vicinity of the proposed Project are already included as part of the LAX Landside Access Modernization Program. The proposed LAX Airfield and Terminal Modernization Project is designed to fit with, and accommodate, those improvements. No additional pedestrian or bike improvements have been identified. 8. It is unclear as to how traffic calming measures applicable to the Project elements (C0, T9, roadway improvements serving T9 and the CTA) would serve to reduce VMT. 9 & 10. Improvements to the bikeway network in the vicinity of the proposed Project, including a multi-use path, are already included as part of the LAX Landside Access Modernization Program to provide access to LAX facilities. The proposed LAX Airfield and Terminal Modernization Project is designed to fit with, and accommodate, those improvements. No additional pedestrian or bike improvements have been identified. 11. Improvements associated with the LAX Landside Access Modernization Program and the AMC include bike paths to/from those facilities and the provision of bike storage equipment, which will be available to LAX employees and passengers wishing to take the APM for travel into and out of the CTA. That means of supporting bicycle use outside of the CTA is considered better and safer than bicyclists using the roadway system within the CTA (i.e., Concourse 0) and Terminal 9.

Table 1
VMT Reduction Strategies

Source of Comment Suggesting VMT Reduction Strategy	Description of VMT Reduction Strategy	Is VMT Reduction Strategy Already Included in the Draft EIR?	Response
			In general, the VMT mitigation program developed for the proposed LAX Airfield and Terminal Modernization Project comprehensively studied the applicable mitigation measures that would be effective in reducing VMT. These measures were based on empirical data relating to their effectiveness. With implementation of Mitigation Measure MM-T (ATMP)-1, VMT Reduction Program, the proposed Project would expand the vanpool program, add an on-demand micro-transit service, and market and promote other transportation solutions and modes. In addition, the LAX Landside Access Modernization Program will provide bicycle facilities at the ITF West as well as connect mass transit to the APM in order to discourage driving and parking at LAX, and the LAX Airfield and Terminal Modernization Project has been designed to accommodate and "fit" with those improvements.
Law Office of Gideon Kracov on behalf of USWW and UNITE HERE Local 11 (ATMP-PC035-41)	Expanded public transit service from neighborhoods where service/hospitality workers live to LAX/AHEZ at times needed for all shifts of work; free or reduced transit passes for LAX/AHEZ workers; and free or reduced parking at LAX/AHEZ for workers who carpool.	Yes	As part of Mitigation Measure MM-T (ATMP)-1, LAWA would expand existing pilot programs that offer micro-transit shuttles for employees living in the airport area to full programs with expanded service areas. Another program included in the mitigation measure is the expansion of LAWA's existing rideshare program, which currently serves LAWA employees, to all LAX workers. With respect to reduced transit passes for LAX/AHEZ workers, please see the discussion in this table for suggestions in ATMP-PC035-37 and 55 above. Expanded benefits for workers who carpool is identified as an additional potential component of Mitigation Measure MM-T (ATMP)-1 which would be considered for implementation if needed to achieve the required reduction in employment VMT.

Table 1
VMT Reduction Strategies

Source of Comment Suggesting VMT Reduction Strategy	Description of VMT Reduction Strategy	Is VMT Reduction Strategy Already Included in the Draft EIR?	Response
Law Office of Gideon Kracov on behalf of USWW and UNITE HERE Local 11 (ATMP-PC035-42)	Quality job creation that expands housing opportunities near LAX/AHEZ for employees via: (a) Operational jobs that provide real living wages able to afford an apartment in Los Angeles, which housing experts estimate must be $33/hour in 2015; and/or (b) Airlines contribute to an affordable housing fund directly for service workers living in neighborhoods surrounding the airport that would promote employees living closer to LAX/AHEZ; and/or (c) Operational jobs that provide "real" healthcare, which must be increased from the current LAX living wave law.	No	The City of Los Angeles and LAWA have a number of policies and programs aimed at improving the economic benefit of jobs linked to LAX projects. These are described in Response to Comment ATMP-PC035-2. However, LAWA does not have any authority or control over housing and does not have the authority to require airlines to contribute to an affordable housing fund as suggested by the commenter. In addition, LAWA is unaware of evidence supporting the assumption that increasing wages or benefits will reduce per-employee VMT; such policies may have other benefits, but LAWA is unaware of evidence that reducing VMT is among them. Notwithstanding, it should be noted that there are already high concentrations of LAX employees living in close proximity (i.e., within 3 to 7 miles) to LAX, as evidenced in Figure 4.8-1 of the Draft EIR.
ARSAC (ATMP-PC038-79)	Off-duty parking lot should be set up for inactive buses, shuttles, TNC's, etc. so they do not park in Westchester Central Business District (CBD). Should have public restrooms and convenience store of vending machines. Perhaps a shuttle to Westchester CBD.	No	LAWA currently provides a holding lot, with toilet facilities and a scheduled food truck, adjacent to the future ITF West, located away from the Westchester Central Business District. This lot is available free of change to all permitted commercial vehicles, including transportation network company (TNC) vehicles, for waiting to pick up passengers/employees from LAX. This holding lot is open 22 hours a day, from 3:00 a.m. to 1:15 a.m. LAWA does not have any control over where private shuttles, buses, and TNCs layover when not in service. Whether these vehicles park in the Westchester Central Business District, or elsewhere, when they are not in service is not an environmental impact requiring mitigation under CEQA.
ARSAC (ATMP-PC038-81)	Prohibit FlyAway buses on Sepulveda between Centinela and Westchester Pkwy between 11pm and 6am	No	The FlyAway service runs 24 hours/day on public streets and is aimed at reducing automobile trips to/from LAX. Prohibiting this service will result in more automobile traffic on Sepulveda Boulevard than currently exist with the service in place. Restricting the hours of operation of FlyAway buses, as suggested by the commenter, would not reduce passenger VMT and could, instead, increase VMT by forcing buses to take less direct travel routes during those hours. In addition, there is no evidence suggesting that this restriction is necessary in order to avoid or lessen a significant environmental effect.

Table 1
VMT Reduction Strategies

Source of Comment Suggesting VMT Reduction Strategy	Description of VMT Reduction Strategy	Is VMT Reduction Strategy Already Included in the Draft EIR?	Response
ARSAC (ATMP-PC038-83)	Promote mass transit to and from LAX	Yes	Mitigation Measure MM-T (ATMP)-1, VMT Reduction Program includes several strategies to promote the use of public transit by employees and passengers. Such measures are included under the Market and Promote Alternative Transportation Options, Expand Incentives and Commuter Benefits, and Explore Incentive Measures from LAWA Mobility Strategic Plan.
ARSAC (ATMP-PC038-86)	TNC operators must have airport badge and fingerprint	No	Airport badging and fingerprinting for TNC operators is a TNC operational issue, and not a VMT reduction strategy.
ARSAC (ATMP-PC038-88)	Create staging lot for taxis, limos, town cars, TNCs, shuttles	No	As noted above, LAWA already provides for such a lot.
ARSAC (ATMP-PC038-92)	Continue VMT monitoring until closure of LAX	No	The duration of, and criteria for, the VMT monitoring program is described on page 4.8-57 of the Draft EIR. The Final EIR has been revised to extend the recommended program from three to five years – see Chapter F3, *Corrections and Clarifications to the Draft EIR*. The monitoring would now be required for a period of five years of sustained VMT reduction from the applicable project baselines and must meet the required VMT reduction for five consecutive years. Once those VMT reduction criteria are met, VMT monitoring would no longer be required. Please see Chapter F3, *Corrections and Clarifications to the Draft EIR*.
ARSAC (ATMP-PC038-93)	FlyAway should have access to CTA after ATMP, same fares or less compared to ground transport. Short headway, no long distances. Advertise and promote FlyAway better. Accept different forms of payment.	Yes	The FlyAway service is continually evolving based on demand. Over time the routes, headways, and fares may change to better address the needs of passengers. LAWA would monitor use of the FlyAway service, and adjust the service in light of demand, as one component of implementing Mitigation Measure MM-T (ATMP)-1, VMT Reduction Program as a means of reducing passenger VMT to the extent it is feasible to do so.
Neighborhood Council of Westchester Playa (ATMP-PC025-9)	Assess penalties for failure to achieve VMT reduction targets; direct penalties to Westchester Playa community	No	. There is no evidence that directing fines and penalties to the Westchester Playa community would reduce airport related VMT.

F2.2 Comments and Individual Responses

ATMP-AS001	**Lin, Alan**	**State of California, Department of Transportation**	**12/7/2020**

ATMP-AS001-1

Comment: Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project.

LAWA proposes to implement the LAX Airfield and Terminal Modernization Project ("Project") as part of LAWA's continuing commitment to maintain LAX as a world-class airport. The project consists of several elements, including airfield improvements to enhance safety and operational management within the north airfield, new concourse and terminal facilities to upgrade passenger processing capabilities and enhance the passenger experience, and an improved system of roadways to better access the Central Terminal Area (CTA) and new facilities while reducing congestion. Airfield Improvements (North Airfield): Airfield safety and operational management would be enhanced with the westerly extension of Taxiway D and relocation and reconfiguration of runway exits from the northernmost runway. New Terminal Facilities: Concourse 0 would be a new easterly extension of Terminal 1. Terminal 9 would be a new passenger terminal located southeast of the Sepulveda Boulevard/Century Boulevard intersection. Taxiways in both the north and south airfields would be modified to provide aircraft access to Concourse 0 and Terminal 9. Roadway Improvements: New arrival and departure roadways would improve access to and from the CTA and would provide access to the new Terminal 9 facility. Access to Terminal 9 would be provided by a new station on the approved LAX Automated People Mover (APM) line with a pedestrian connection to Terminal 9. Other landside improvements associated with Terminal 9 include a pedestrian corridor between Terminals 8 and 9 that would bridge across Sepulveda Boulevard, and a parking facility.

Response: LAWA thanks Caltrans for its review of the Draft EIR. The comment accurately summarizes the key elements of the proposed Project, which are presented in detail in Section 2.4 of the Draft EIR.

ATMP-AS001-2

Comment: As a reminder, please consider integrating transportation and land use in a way that reduces VMT and Greenhouse Gas (GHG) emissions by facilitating the provision of more proximate goods and services to shorten trip lengths and achieve a high level of non-motorized travel and transit use.

Response: The comment is noted. As indicated at the beginning of Caltrans' comment letter (see comment ATMP-AS001-1 above), the proposed Project includes a connection to the LAX Automated People Mover, along with pedestrian improvements to the Central Terminal

Area. These elements of the proposed Project would support the State's greenhouse gas (GHG) emissions reduction goals by improving transit access and providing passengers with more attractive alternatives to automobile travel. Additionally, it should be noted that Mitigation Measure MM-T (ATMP)-1 presented in Section 4.8.5.2.2 of the Draft EIR includes several measures to reduce VMT, which would also serve to reduce GHG emissions.

ATMP-AS001-3

Comment: Caltrans seeks to promote safe, accessible multimodal transportation. Methods to reduce pedestrian and bicyclist exposure to vehicles improves safety by lessening the time that the user is in the likely path of a motor vehicle. Caltrans recommends the project consider the use of methods such as, but not limited to, the construction of physically separated facilities such as sidewalks, raised medians, refuge islands, and off-road paths and trails, or a reduction in crossing distances through roadway narrowing.

Response: The comment refers to reducing pedestrian and bicyclist exposure to vehicles through the design of specific facilities. The proposed Project does not include any new bicycle facilities, but would add elevated pedestrian connections directly to the proposed Concourse 0 and Terminal 9 from the Automated People Mover (currently under construction) along with the construction of a pedestrian corridor from Terminal 8 to Terminal 9 over Sepulveda Boulevard. All these new pedestrian connections have been designed with safety in mind with pedestrians being physically separated from vehicles.

ATMP-AS001-4

Comment: Additionally, pedestrian and bicyclist warning signage, flashing beacons, crosswalks, signage and striping can be used to indicate to motorists that they should expect to see and yield to pedestrians and bicyclists. Visual indication from signage can be reinforced by road design features such as lane widths, landscaping, street furniture, and other design elements.

Response: As noted in Response to Comment ATMP-AS001-3 above, the proposed Project would not be implementing any changes to the bicycle network. However, in the case of proposed pedestrian improvements, such as the new elevated connections to the Automated People Mover from/to Terminal 9 and Concourse 0 and between Terminal 8 and Terminal 9, these improvements are being designed to separate pedestrians from vehicle traffic and, as such, do not require signage alerting motorists to yield to pedestrians.

ATMP-AS001-5

Comment: The main pedestrian connection to LAX is via Century Blvd. Sidewalks and crosswalks are located on the north and south side of Century Blvd. between I-405 and World Way. A

gap in the sidewalk exists on the south side of Century Blvd. between World Way and Avion Drive. Landscaped buffers between the roadway and the pedestrian walkway are located on both sides of the street between Avion Drive and Aviation Blvd.

Response: The comment accurately describes the general characteristics of pedestrian facilities along Century Boulevard in the general vicinity of LAX. Regarding the absence of a sidewalk on the south side of Century Boulevard between World Way and Avion Drive, it should be noted that there are no uses adjacent to that roadway segment that require pedestrian access, nor is there a sidewalk along the east side of Sepulveda Boulevard or a crosswalk across Sepulveda Boulevard on the south side of Century Boulevard. In other words, there is no reason to have a sidewalk on the south side of Century Boulevard between World Way and Avion Drive.

ATMP-AS001-6

Comment: City of Los Angeles Mobility Plan 2035 has identified future planned bicycle facilities along segments of Lincoln Blvd., South La Tijera Blvd, Westchester Parkway, and Manchester Ave. in the vicinity of the Project area. In addition, the LAX landside Access Modernization Program includes additional modifications to the bike facilities in the Project area including removing existing bike lane on 96th Street between new Jetway Blvd. and Airport Blvd. and construction of a combination bike lane and multi-use paths for shared use by pedestrians and bicyclists. Bike facilities will include: bike lanes on Westchester Blvd. from new Jetway Blvd. to Airport Blvd. and on Airport Blvd. from Arbor Vitae Street to Century Blvd; striped bike paths along new Jetway Blvd. from Arbor Vitae Street to Century Blvd. and along new 94th Street from new Jetway Blvd. to Airport Blvd.; and a multi-use path on the south side of Century Blvd. between Airport Blvd. and Aviation Blvd., continuing north on the west side of Aviation Blvd. and turning west along the south side of Arbor Vitae Street to La Cienega Blvd.

Response: The comment regarding bicycle facilities is noted and will be included in the Final EIR for consideration by the decision-makers prior to taking any action on the LAX Airfield and Terminal Modernization Project. No further response is required because the comment does not raise any significant environmental issues. (See Public Resources Code Section 21091(d); State CEQA Guidelines Sections 15088(c), 15204(a).)

ATMP-AS001-7

Comment: Fifteen bus lines currently serve the LAX City Bus Center and the Metro Green Line Aviation/LAX Station. Seven bus lines are operated by Metro, two bus lines are operated by the Culver City Bus (CC), two bus lines are operated by Santa Monica Big Blue Bus (SM), two bus lines are operated by LADOT Commuter Express (CE), one bus line is operated by Torrance Transit (TT), and one bus line is operated by the City of Redondo beach – Beach Cities Transit (BCT). In addition, the LAX FlyAway serves the CTA. There are also dozens of other transit lines that connect to the Metro green Line and are, therefore, accessible to LAX via one transfer at a Metro Green Line station.

Response: The comment regarding transit service in the vicinity of LAX is noted and will be included in the Final EIR for consideration by the decision-makers prior to taking any action on the LAX Airfield and Terminal Modernization Project. No further response is required because the comment does not raise any significant environmental issues. (See Public Resources Code Section 21091(d); State CEQA Guidelines Sections 15088(c), 15204(a).)

ATMP-AS001-8

Comment: On page 4.8-41 of the Draft EIR, the Table 4.8-10 Summary of Projected VMT for Existing Conditions, Projected Future Conditions Baseline (2028), and Proposed Project (2028) indicated the Existing Conditions (2019)/Projected Future Conditions Baseline (2028)/Proposed Project (2028) for the total Passenger VMT is 6,581,811/8,676,209/8,708,995 respectively, and for the VMT per Employee is 25.2/24.0/23.9 respectively.

As shown in Table 4.8-13 on page 4.8-51 (Repeated table from Table 4.8-10), VMT per employee under Projected Future Conditions Baseline (2028) will be more efficient than under existing (2029) conditions. We concur that this is primarily due to planned improvements to transit (e.g., opening of the Crenshaw/LAX Line) and improvements associated with Phase 1 of the LAX Landside Access Modernization Program, including new roadways, the APM, ITF West, ITF Fast, and CONRAC, as well as travel demand management (TDM) measures. These changes will result in an improved efficiency metric of 24 VMT per employee (compared to 25.2 under existing conditions).

The addition of the proposed Project would result in changes to the parking destination for some existing and new Project employees, which would slightly improve the VMT per employee rate. As shown in Table 4.8-13, the Project would result in 23.9 VM per employee. Although this would be a decrease compared to Projected Future Conditions Baseline (2008), the decrease would not be at least 15 percent below the baseline (i.e., 20.4), which is the threshold of significance. Because the proposed Project would generate VMT per employee that would exceed 15 percent below the Projected Future Conditions Baseline (2028) VMT per employee rate, this would be a significant impact.

The project proposed the following mitigation measures as MM-T (ATMP)-1 VMT Reduction Program:

- Expand LAWA's Rideshare Program
- Formalize Employee Telecommuting Program
- Provide On-demand Micro-Transit Shuttle
- Market and Promote Alternative Transportation Options
- Conduct Parking Study to Price Parking to Reduce VMT
- Expand Incentives and Commuter Benefits
- Evaluate Modifications to FlyAway Service
- Explore Incentive Measures from LAWA Mobility Strategy Plan
- Evaluate the Potential for Congestion Pricing in the CTA
- Annual Monitoring and Reporting

We concur that with implementation of Mitigation Measure MM-T (ATMP)-1, the significant impact related to employment VMT would be reduced to a less than significant impact. The proposed Project would result in a net increase of 32,786 total passenger VMT over the Projected Future Conditions Baseline (2028). This would be a significant impact. Even with mitigation, this would remain a significant and unavoidable impact. The proposed Project would induce an additional 18,220 VMT compared to the Projected Future Conditions Baseline (2028). This would be a significant impact. There are no feasible mitigation measures for this impact. As such, it would be a significant and unavoidable impact.

Response: The comment accurately summarizes the key components of the VMT analysis of the proposed Project as presented in Section 4.8 of the Draft EIR, including the results of the VMT calculations, the VMT impacts, the VMT reduction strategies for mitigation of VMT impacts, and the conclusions regarding significance of the VMT impacts. Please also see Topical Response TR-ATMP-T-2 regarding VMT mitigation measures and monitoring for the LAX Airfield and Terminal Modernization Project. As indicated therein, in light of comments received on the Draft EIR, certain clarifications have been made to the description of potential VMT reduction strategies included in Section 4.8.5.2.2 of the Draft EIR as related to LAWA's Rideshare Program and related to telecommuting. Please see Chapter F3, Corrections and Clarifications to the Draft EIR, regarding incorporation of these changes into the Final EIR. These clarifications do not require any changes to the transportation analysis and do not alter the results or conclusions of the transportation analysis.

ATMP-AS001-9

Comment: The proposed improvements: 1) to construct above-grade access ramps at Sepulveda Blvd and Century Blvd to facilitate traffic flow in and around LAX, 2) to remove the cloverleaf ramps at the intersection of Sepulveda Blvd and Century Blvd, along with the elimination of the free right-turn lane on southbound Sepulveda Blvd to westbound CTA and eastbound World Way onto southbound Sepulveda Blvd., 3) to remove access point from World Way to southbound Sepulveda Blvd and reroute to the new above-grade ramps, 4) to construct an above-grade pedestrian bridge at Sepulveda Blvd and Century Blvd., would need to be oversight by Caltrans.

Response: The comment is noted. LAWA will coordinate with Caltrans District 7 staff during the detailed engineering design phase of the proposed Project and request the necessary approvals/permits for construction of the Project roadways.

ATMP-AS001-10

Comment: The new signalized intersections at Sepulveda Blvd. (SR-01) and 96th Street would require performing Intersection Control Evaluation (ICE).

Response: It is understood and agreed that, in conjunction with more detailed planning, engineering, and design of the improvement and signalization of the intersection of

Sepulveda Boulevard and 96th Street, an Intersection Control Evaluation (ICE) will need to be completed. LAWA will coordinate with Caltrans District 7 staff regarding completion of the ICE.

ATMP-AS001-11

Comment: For this project, transportation of heavy construction equipment and/or materials, which requires the use of oversized-transport vehicles on State highways, will require a transportation permit from Caltrans. It is recommended that large size construction/operation truck trips be limited to off-peak commute periods and idle time not to exceed 10 minutes.

Response: LAWA will continue to coordinate with Caltrans on components of the LAX Airfield and Terminal Modernization Project during construction. All Caltrans development and permit procedures would be followed during implementation.

ATMP-AR001 Leger, David South Bay Cities Council of Governments 11/10/2020

ATMP-AR001-1

Comment: The South Bay Cities Council of Governments (SBCCOG) requests an extension of the deadline for public comments on LAWA's Airfield & Terminal Modernization Project draft EIR. Attached is a letter from SBCCOG Chair, Hawthorne Councilmember Olivia Valentine, detailing the request.

Response: On October 29, 2020, LAWA published the Draft EIR for the proposed LAX Airfield and Terminal Modernization Project. In accordance with the State CEQA Guidelines, the Draft EIR was originally circulated for public review for 47 days (two days more than the required minimum 45 days), with the review period originally closing on December 14, 2020. A virtual open house was launched on November 25, 2020 that provided detailed information about the proposed LAX Airfield and Terminal Modernization Project and the Draft EIR analysis. LAWA also held a virtual public meeting on December 1, 2020 that provided stakeholders with a presentation on the proposed Project and the Draft EIR analysis, as well as an opportunity for questions and answers. The comment period for the Draft EIR was extended twice due to requests from the community and neighboring jurisdictions, including the South Bay Cities Council of Governments. It was initially extended by 60 days to February 12, 2021, and then extended again for an additional 31 days, for a total comment period of 138 days, with the comment period closing on March 15, 2021. LAWA determined that the two extensions of the comment review period, which resulted in a comment period that was more than triple the review time required by CEQA, coupled with the virtual open house and virtual public meeting described above, provided adequate time and information for public review of the Draft EIR.

ATMP-AR002 Bacharach, Jacki South Bay Cities Council of Governments 2/26/2021

ATMP-AR002-1

Comment: The South Bay Cities Council of Governments (SBCCOG) has reviewed Los Angeles World Airport's (LAWA) draft Environmental Impact Report (EIR) for the proposed LAX Airfield & Terminal Modernization Project (ATMP) and is raising the following concerns that should be addressed in the Final Draft and Response to Comments:

Response: LAWA thanks the South Bay Cities Council of Governments (SBCCOG) for its review of the Draft EIR. Please see Responses to Comments ATMP-AR002-2 through ATMP-AR002-7 below.

ATMP-AR002-2

Comment: 1. Enhanced regionalization. The SBCCOG strongly supports prioritizing efforts to regionalize air traffic to other existing airports such as Ontario International Airport, Burbank Airport and John Wayne Airport, and to support efforts to develop facilities in other areas. As the world begins to emerge from the COVID-19 pandemic and as air traffic begins to return to pre-pandemic levels, there should be a concerted effort to encourage regionalization. Airport officials must begin looking into ways that will encourage major air carriers of both passenger and cargo loads to return to Los Angeles' regional airports, not only LAX. There have been earlier efforts made at regionalization, including as part of a 2006 court settlement over expansion plans at LAX. However, those efforts largely never materialized and have not been revisited in the 15 years since major populations now live in the outlying areas around the regional airports. Now is the time to partner with other airports, LA City, LA County, adjacent counties, local leaders, and communities to work toward truly regionalizing the air traffic coming into the greater Los Angeles region. Regionalization will not only help minimize the impacts of growth on one particular area but will also help expand the economic benefits of increased air traffic to communities who may not have previously benefitted and provide much greater convenience for large areas of the population of the region. The SBCCOG looks forward to working with LAWA and other stakeholders on this endeavor.

Response: Section 2.3.1.2.1 of the Draft EIR discusses the Southern California Association of Governments (SCAG) regional aviation activity forecast, which includes a projection of how the region's future aviation demand will be distributed between commercial airports in the region. As indicated in Table 2-1 of the Draft EIR and in Appendix B.1 of the Draft EIR, LAX's share of the regional demand is projected to decrease in future years relative to other airports in the region. Specifically, the Draft EIR states on page 2-16, "SCAG projects that LAX's share of future passenger activity levels at commercial airports within the region will decrease by over 12 percent compared to base year (2017) conditions, reflecting the assumption that the constrained airfield system at LAX will result in a shift of some of the future demand to other airports in the region." As indicated in Section 3.2.1 of Appendix B.1, it is anticipated that other regional airports, including Hollywood Burbank Airport, Long Beach Airport, Ontario International Airport,

and John Wayne Airport, will continue to play a critical role in supporting regional air travel demand. As shown in Table 2-1 of the Draft EIR, even reliever airports in the region, such as Palmdale Regional Airport and San Bernardino International Airport, will also play a role in accommodating future growth in regional aviation demand. It should be noted that, while LAWA has engaged, and will continue to engage, with regional planning agencies and the operators of other commercial airports in the region regarding regional aviation demand issues, LAWA has no authority over the operations, infrastructure, or planned improvements at other airports.

The LAX Airfield and Terminal Modernization Project Draft EIR contemplated alternative locations for the proposed Project. As discussed in Section 5.4.1.1, the possibility of alternative locations for the proposed Project was evaluated but was not carried forth for further evaluation in the Draft EIR for the reasons described therein. As indicated in Section 5.4.1.1, alternative locations would not meet the underlying purpose of the proposed Project. A regional alternative would not meet the proposed Project objectives of supporting the ongoing modernization of LAX, providing excellent passenger service at LAX, and reducing airport-related traffic impacts in adjacent communities. Moreover, a regional alternative would not be feasible as LAWA has no authority over operations or infrastructure at other regional airports and does not have the ability to reasonably acquire, control, or otherwise have access to any alternative site, including any of the other existing regional airports, where the proposed Project's purpose and objectives would be able to be achieved. Of particular relevance is the fact that the aviation demand forecast for LAX estimates that passenger demand will reach 110.8 MAP in 2028 regardless of whether the improvements associated with the proposed Project are implemented. Making improvements at other airports in the region instead of at LAX would not diminish the projected passenger levels anticipated to occur at LAX but, rather, would compromise LAWA's ability to accommodate that future growth efficiently and with good quality passenger service. Please also refer to Response to Comment ATMP-AL007-3 for additional discussion regarding the notion of regional alternative.

ATMP-AR002-3

Comment: 2. Growth Projections. Although both SCAG and LAWA project air traffic growth at LAX regardless of the ATMP, it behooves all stakeholders to evaluate the long-term impacts of COVID-19 on previous growth projections. Even though the current downturn in air traffic will likely rebound in the coming years, it is important to evaluate the long-term behavioral changes accelerated by the pandemic. For example, population centers may shift inland in the next 25 years due to the ability to work remotely and business travel may not return to previous levels.

Response: Please see Topical Response TR-ATMP-G-1 regarding the aviation demand forecast for LAX and the COVID-19 pandemic context. As documented in the topical response, uncertainties associated with the severity and duration of the contraction in aviation activity resulting from the COVID-19 global pandemic still exist in mid-2021. However, LAX has recently shown signs of post-pandemic recovery. The Draft EIR evaluates and discloses the impacts of the proposed Project when it would be fully operational in the buildout year of 2028. As a result of the COVID-19 pandemic, impacts analyzed in the

Draft EIR are most likely commensurate to higher levels of activity than will actually occur in 2028. Thus, the Draft EIR's analysis of impacts related to passenger activity levels in 2028 can be considered conservative. Further, there is no evidence at this time that the COVID-19 pandemic has resulted in long-term behavioral changes that would shift population centers in any way that would impact the Draft EIR's aviation activity forecast. Therefore, the aircraft operation and passenger forecasts prepared for the Draft EIR do not need to be revised.

ATMP-AR002-4

Comment: Additionally, it is imperative that evaluations be done to study if growth forecasts for other regional airports such as Ontario International, can accommodate their planned growth without additional infrastructure investments. Growth at Ontario will likely not perform to forecast levels if that facility cannot accommodate the additional air traffic, which could have long-lasting negative impacts on efforts at regionalization. If significant infrastructure expansion is needed to facilitate that growth, implementation of those improvements must be a top priority of the region. Otherwise, the ATMP will by default induce growth at LAX because the other airports will not be able to accommodate their increasing traffic and airlines will choose to go back to LAX because it will have the capacity and new facilities.

Response: The scope of the Draft EIR prepared for the LAX Airfield and Terminal Modernization Project does not require a study of regionalization, or whether other airports in the Los Angeles region, such as Ontario International Airport cited by the commenter, can accommodate their own forecasted activity levels.

The Draft EIR addresses growth inducing impacts in Section 6.3. Potential growth inducing impacts associated with the proposed Project improvements were also analyzed and documented in Appendix B.2 of the Draft EIR and summarized in Section 2.3.1.2.2 of the Draft EIR. As explained there, the annual activity forecast and regression analysis prepared by LAWA's aviation experts determined that aircraft operations would be the same in 2028 with or without the proposed Project, and that the proposed Project would not result in increased aviation and/or passenger activity levels or capacity at LAX. This analysis is supported by substantial evidence as documented in Appendix B.1 of the Draft EIR. Please see Topical Response TR-ATMP-G-1 and Response to Comment ATMP-AL010-205 for further discussion of the relationship between the proposed Project airfield improvements and induced growth. As documented, the proposed Project improvements would not directly or indirectly induce growth at LAX. Therefore, contrary to the commenter's assertion, the proposed Project improvements would not create capacity that would become available to accommodate additional passenger demand leaking from other airports in the region that can no longer accommodate their own passenger growth.

As documented in Section 4 of Appendix B.1 of the Draft EIR, it is anticipated that the airfield system component at LAX would constrain its ability to accommodate future growth, starting in approximately 2029. This is evidenced by the results of the constrained demand scenario forecast presented in Section 4.5 of Appendix B.1, which

reflected an anticipated reduction in passenger growth (from a 2.2 percent compounded annual growth rate (CAGR) under the unconstrained forecast documented in Table 3-8 down to 1.5 percent CAGR under the constrained demand scenario forecast documented in Table 4-1).

These limitations have also been incorporated in SCAG's regional forecasts which reflects a reduction in the regional share of passengers allocated to LAX between 2017 and 2045. Therefore, a greater share of regional passengers was allocated to other airports in the region[1].

[1] See Southern California Association of Governments, Connect SoCal Technical Report: Transportation System - Aviation and Airport Ground Access, adopted September 3, 2020, Table 12 on p. 33. LAX's market share goes from 76.7 percent (84.56 divided by 110.17 million annual passengers) to 64.4 percent (127 divided by 197.14 million annual passengers). Available: https://www.connectsocal.org/Documents/Adopted/0903fConnectSoCal_Aviation-And-Airport-Ground-Access.pdf.

ATMP-AR002-5

Comment: The SBCCOG remains concerned that although LAWA and SCAG projections forecast growth at LAX regardless of the project, the ATMP will significantly accelerate that growth on a timeline that outpaces any required infrastructure improvements. When a new lane is added to a freeway, that additional capacity is always considered growth inducing. Studies have shown that adding capacity to roadways encourages additional use of those facilities. The SBCCOG continues to have reservations about LAWA's denial that the proposed improvements are not inducing growth.

Response: Improvements to a freeway are not analogous to improvements at an airport, as the basic nature, function, and design of the two types of facilities are vastly different.

Please see Response to Comment ATMP-AR002-4 for a discussion of potential growth inducing effects associated with the proposed Project improvements. As documented, the proposed Project improvements would not directly or indirectly induce growth at LAX. Therefore, contrary to the commenter's assertion, the proposed Project improvements would not "significantly accelerate [that] growth on a timeline that outpaces any required infrastructure improvements."

Even though the proposed Project improvements would include new roadway segments as discussed in Section 2.3.1.1.3 of the Draft EIR, it is anticipated that the airfield system component at LAX would become the first airport component to limit the ability of LAX to accommodate unconstrained growth, as documented in Section 4.2.2 of Appendix B.1 of the Draft EIR. Therefore, the ground access improvements provided by the proposed Project would not alleviate capacity limitations of the airfield system component, which is essential to accommodating aircraft operations and, therefore, passengers flying in and out of LAX.

ATMP-AR002-6

Comment: 3. Traffic Impacts to the South Bay. The SBCCOG believes that the draft EIR does not adequately evaluate impacts to motorists coming from the South Bay. Although CEQA may not require it, LAWA should not use the Vehicle Miles Traveled standard to avoid responsibility for the increased congestion on the critical thoroughfares that will directly result from this large airport expansion. In particular, LAWA should work with other stakeholders such as the SBCCOG, LA Metro, Caltrans, and surrounding cities who have been working together to identify freeway improvements and can do so again to address off site roadway mitigation improvements necessitated by this project. Even though LAWA may be subject to restrictions by the FAA on paying for these off-facility improvements, the impacts to these facilities occur, nonetheless. For example, it may prove beneficial for LAWA to work with other implementing agencies to address the Century Boulevard exit on the northbound I-405 to allow motorists to head west on Century Boulevard without the need for a traffic signal.

Response: The content of this comment is essentially the same as comment ATMP-AL007-7; please refer to Response to Comment ATMP-AL007-7 and Topical Response TR-ATMP-T-1, which discuss the assessment of transportation effects associated with the LAX Airfield and Terminal Modernization Project that are not subject to CEQA, which was conducted in accordance with the City of Los Angeles Transportation Assessment Guidelines and with State law (SB 743; State CEQA Guidelines Section 15064.3). As indicated therein, traffic congestion is no longer used as a basis for determining significant impacts for land use projects and plans in California.

ATMP-AR002-7

Comment: 4. Terminal 9. The SBCCOG thanks LAWA for committing to eliminate permanent access from Sepulveda Boulevard to T9. However, temporary access remains a possibility if the Terminal opens before the aerial roadway system is complete. We feel strongly that temporary access from Sepulveda Blvd is unwise. If merging movements within the Sepulveda tunnel are already bad, they will continue with a temporary access to T9 and might be even more confusing. There will already be access to T9 via Century Blvd and the new Jet Way street which are not dependent on the construction of the aerial roadway and they should alleviate the need for temporary access from Sepulveda, particularly given the burden it will cause on the traffic traveling through the tunnel. We urge you to commit to eliminating any access from Sepulveda Blvd at any time to Terminal 9. Temporary access is costly and unsafe as you have already recognized by eliminating the permanent access from Sepulveda. If a third access to Terminal 9 is deemed necessary, then we would ask that you delay the opening of Terminal 9 until the aerial roadway system is completed.

Response: The type of short-term temporary impacts described in the comment appear to be related to traffic congestion and delay. As described on page 4.8-18 of the Draft EIR, regulatory changes at the State level have resulted in the "elimination of auto delay, LOS, and other similar measures of vehicular capacity or traffic congestion as a basis for

determining significant impacts for land use projects and plans in California." Please see Topical Response TR-ATMP-T-1 regarding CEQA transportation analysis requirements. Please also see Response to Comment ATMP-AL007-8 for additional discussion regarding this temporary access. It should be noted that this access is only a temporary condition that would be implemented if needed while the permanent roadway improvements are being developed and the subject access ramps would be constructed largely on airport property east of, and away from, Sepulveda Boulevard in an area north of, and outside of, the Sepulveda Tunnel. The access roads would include two ramps, one connecting to the departures level and the other to the arrivals level, which would facilitate moving traffic off of northbound Sepulveda Boulevard and into the Terminal 9 curbside areas.

ATMP-AR003 Sun, Lijin South Coast Air Quality Management District 3/12/2021

ATMP-AR003-1

Comment: Draft Environmental Impact Report (Draft EIR) for the Proposed Los Angeles International Airport Airfield and Terminal Modernization Project (Proposed Project) (State Clearinghouse No.: 2019049020)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. Los Angeles World Airports (LAWA) is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. The following comments include recommended revisions to the CEQA baseline and air dispersion modeling, and information regarding South Coast AQMD permits for stationary equipment that should be included in the Final EIR.

Based on the Draft EIR, the Proposed Project consists of airfield, terminal, and landside improvements at Los Angeles International Airport (LAX)[1]. As part of LAWA's continuing commitment to maintain LAX as a world-class airport, the improvements include an 11-gate concourse facility, a 12-gate terminal, an automated people mover station, a pedestrian bridge, runway reconfiguration, and removal of remote gates[2]. Construction of the Proposed Project will occur in a six-year period from 2022-2028[3]. It is anticipated that operation will begin in 2028[4].

Based on a review of the Draft EIR and supporting technical documents, South Coast AQMD staff has three main comments. A summary of these comments is provided as follows with additional details provided in the attachment.

[1] Draft EIR. Section 1, Introduction and Executive Summary. Page 1-1.
[2] Ibid. Page 1-5.
[3] Draft EIR. Section 2, Description of the Proposed Project. Pages 2-77 to 79.
[4] Ibid.

Response: LAWA thanks the South Coast Air Quality Management District (SCAQMD) for its review of the Draft EIR. This comment is an introduction to the main body of the comment letter, including a brief description of the roles of LAWA and the SCAQMD, a summary

of the proposed Project, and an indication that the SCAQMD has three main comments regarding the Draft EIR. No response is needed regarding the roles of each agency and the project description summary is accurate. Regarding the three main comments, please refer to Responses to Comments ATMP-AR003-2 through ATMP-AR003-4 below.

ATMP-AR003-2

Comment: 1. CEQA Baseline: The Draft EIR calculates the Proposed Project's operational emissions and uses the comparison between the operational emissions at the expected buildout conditions (year 2028) and those at the existing conditions (year 2018) to determine the significance level for the Proposed Project's operational air quality impacts. This comparison might have improperly credited the Proposed Project with emission reductions associated with on-road mobile sources that will occur independent of the Proposed Project due to federal and state rules and regulations on clean vehicles and fuel technologies. The Final EIR should use the comparison between the operational emissions in year 2028 with the Proposed Project and the emissions in the same year without the Proposed Project to determine the level of significance for the Proposed Project's air quality impacts.

Response: This comment is a summary of comment ATMP-AR003-10; please refer to Response to Comment ATMP-AR003-10 regarding the selection of the CEQA baseline.

ATMP-AR003-3

Comment: 2. Air Dispersion Modeling Parameter: The Draft EIR states that sensitive receptors locations were determined in a manner that would identify peak ambient air pollutant impacts associated with the Proposed Project[5]. However, the receptor grid that was used in the air dispersion modeling was focused only on the fenceline and might not have been large enough to identify the maximum off-site concentrations. The Final EIR should provide additional information to justify the receptor grid used or perform additional modeling with an expanded receptor grid.

[5] Ibid. Section 4.1.1, Air Quality. Page 4.1.1-14.

Response: This comment is a summary of comment ATMP-AR003-11; please refer to Response to Comment ATMP-AR003-11 regarding the receptor grid used in the air dispersion modeling analysis.

ATMP-AR003-4

Comment: 3. Responsible Agency and South Coast AQMD Permits: The Proposed Project will use rock crushing equipment during construction, and emergency generators, fire hydrant technologies, and fuel storage tanks during operation. If permits from South Coast

AQMD are required, South Coast AQMD should be identified as a Responsible Agency in the Final EIR.

Response: This comment is a summary of comment ATMP-AR003-12; please refer to Response to Comment ATMP-AR003-12 regarding permits that may be required from SCAQMD.

ATMP-AR003-5

Comment: South Coast AQMD Staff's Summary of the Air Quality Analysis and Health Risk Assessment
The Draft EIR quantifies the Proposed Project's regional construction emissions, which includes both direct emissions from construction activities and indirect emissions that would occur as a result of temporary runway closures, and the emissions are compared to South Coast AQMD's regional CEQA air quality significance thresholds. Based on the analysis, the Proposed Project's mitigated construction emissions from nitrogen oxides (NOx), volatile organic compounds (VOCs), carbon monoxide (CO), and sulfur oxides (SOx) would be significant and unavoidable at 805 pounds per day (lbs/day), 385 lbs/day, 4,394 lbs/day, and 173 lbs/day, respectively[6].

[6] Draft EIR. Section 4.1.1. Page 4.1.1-40.

Response: The comment accurately summarizes the construction-related emissions impact conclusions presented in Table 4.1.1-8 and Section 4.1.1.5.1.3 of the Draft EIR.

ATMP-AR003-6

Comment: The Draft EIR includes a comparison between the Proposed Project's criteria pollutants emissions in 2028 and the emissions in 2018 to determine the level of significance for the Proposed Project's regional operational air quality impacts[7]. Based on the analysis, the Proposed Project's mitigated regional operational emissions from NOx, SOx, particulate matter (PM10), and fine particulate matter (PM2.5) would be significant and unavoidable at 2,509 lbs/day, 495 lbs/day, 658 lbs/day, and 178 lbs/day, respectively[8].

[7] Ibid. Page 4.1.1-34.
[8] Ibid. Page 4.1.1-45.

Response: The comment accurately summarizes the regional operational emissions impact conclusions presented in Table 4.1.1-10 and Section 4.1.1.5.2.3 of the Draft EIR.

ATMP-AR003-7

Comment: According to the Draft EIR, the Proposed Project would result in a maximum of 1-hour nitrogen dioxide (NO2) concentration of 264 micrograms per cubic meter (µg/m3) during construction and 336 ug/m3 during operation[9,10].

[9] Ibid. Pages 4.1.1-51 and 52.
[10] Based on the air dispersion modeling that was performed to analyze the Proposed Project's localized air quality impacts, LAWA found that the Proposed Project would result in NO2 concentration of 0.027 (1-hour) and 0.264 (annual) parts per million (ppm) during construction and 0.033 (1-hour) and 0.336 (annual) ppm during operation. (Draft EIR. Section 4.1.1. Page 4.1.1-51 and 52). In the Appendix I: Health Effects of the 2016 AQMP, South Coast AQMD staff discussed a 2016 health study by the U.S. EPA. The study found that when adults with asthma are exposed to NO2 at the 100 parts per billion (ppb) to 300 ppb concentrations, they experienced an increase in airway responsiveness, which in asthmatics can worsen symptoms and reduce lung function. (Page I-54. Accessed at: https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/appendix-i.pdf).

Response: The comment summarizes the total hourly nitrogen dioxide (NO2) concentrations reported in micrograms per cubic meter (ug/m3) presented in Table 4.1.1-13 and Table 4.1.1-14 of the Draft EIR, for Project construction and operations, respectively.

Footnote 10 of the comment incorrectly converts the reported ug/m3 to parts per million (ppm) by simply dividing the reported ug/m3 value by 1,000. In addition, it incorrectly reports annual concentrations as hourly concentrations, and vice versa (i.e., hourly concentrations are reported as annual). From these errors, the commenter draws conclusions regarding the health impacts of NO2 that are derived from incorrect conversion of the reported data. The correct conversion of ug/m3 to ppm would be to divide the ug/m3 value by approximately 1,883. The correct values of reported NO2 concentrations are 0.140 ppm hourly NO2 and 0.014 ppm annual NO2 for construction and 0.178 ppm hourly NO2 and 0.018 ppm annual NO2 for operations. To compare these data more directly, hourly NO2 construction concentrations would be 0.140 ppm, not 0.264 as calculated by the commenter; annual NO2 construction concentrations would be 0.014 ppm, not 0.027 as calculated by the commenter; hourly NO2 operational concentrations would be 0.178 ppm, not 0.336 as calculated by the commenter; and annual NO2 construction concentrations would be 0.018 ppm, not 0.033 as calculated by the commenter.

Footnote 10 also discusses research that identified some effects of NO2 concentrations in the range of 100 to 300 parts per billion (0.100 to 0.300 ppm) on adults with asthma. While the peak hourly values of NO2 reported in the Draft EIR fall within the lower end of that range, the location of the operation peak is along Sepulveda Boulevard, near the intersection with Century Boulevard (please see Response to Comment ATMP-AR003-11 for a figure showing peak impact locations). Concentrations at residential locations around the airport would be much lower than the reported peak values due to their distance from the airport itself and distance from the proposed Project roadway

improvements. Also note that the peak values discussed in the comment include background concentrations from existing sources in the vicinity.

ATMP-AR003-8

Comment: The Proposed Project's operational PM10 concentrations based on a 24-hour average and an annual average would be 6.2 µg/m3 and 3.7 µg/m3, respectively[11].

[11] Draft EIR. Section 4.1.1. Page 4.1.1-52.

Response: The comment accurately summarizes the operational PM10 concentrations from the proposed Project as presented in Table 4.1.1-14 of the Draft EIR.

ATMP-AR003-9

Comment: The Draft EIR includes a health risk assessment (HRA) and states that the Proposed Project would result in a decrease in cancer inhalation risk of 1 in one million during construction and a decrease in cancer inhalation risk of 4 in one million during operation [12,13], which would not exceed South Coast AQMD's CEQA significance threshold of 10 in one million for cancer risk[14].

[12] Ibid. Appendix C: Air Quality, Human Health Risk Assessment, Greenhouse Gas Emissions, and Energy. Section 4: Protocol for Conducting an Air Quality Impact Analysis of Criteria Pollutants. Page 4-4.
[13] HRA based on a 30-year adult residential exposure scenario used to determine significance. Ibid. Page 4-6.
[14] South Coast AQMD's CEQA significance threshold of 10 in one million for cancer risk is based on the most current methodology recommended by the California Office of Environmental Health Hazard assessment.

Response: The comment summarizes text from the human health risk assessment in Section 4.1.2 and Appendix C of the Draft EIR and confirms that the cancer risk associated with the proposed Project does not exceed the South Coast AQMD's significance threshold. The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the LAX Airfield and Terminal Modernization Project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the LAX Airfield and Terminal Modernization Project Draft EIR. (See Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a).)

ATMP-AR003-10

Comment: South Coast AQMD staff's detailed comments on the Draft EIR are provided as follows.

1. CEQA Baseline
Under CEQA, baseline conditions exist at the time of the environmental review is initiated or as they exist at the time the Notice of Preparation (NOP) is published, if there is a published NOP. Notwithstanding this general rule, the Lead Agency has the discretion to define the existing physical conditions, supported by substantial evidence. To facilitate an EIR's role as an informational document, the use of future baseline is proper in some cases. "Thus, an agency may forego analysis of a project's impacts on existing environmental conditions if such an analysis would be uninformative or misleading to decision makers and the public." (*Neighbors for Smart Rail v. Exposition Metro Line Construction Authority* (2013) 57 Cal.4th 439). (See also CEQA Guidelines Section 15125(a)(2)). Consideration of future conditions in determining whether a project's impacts may be significant is consistent with CEQA's rules regarding baseline, especially when the project has a long-term buildout schedule. "[N]othing in CEQA law precludes an agency … from considering both types of baseline—existing and future conditions—in its primary analysis of the project's significant adverse effects." (*Neighbors for Smart Rail*, supra, 57 Cal.4th 439, 454). "Even when a project is intended and expected to improve conditions in the long term—20 or 30 years after an EIR is prepared—decision makers and members of the public are entitled under CEQA to know the short- and medium-term environmental costs of achieving that desirable improvement. … [¶] … The public and decision makers are entitled to the most accurate information on project impacts practically possible, and the choice of a baseline must reflect that goal." (See also *Communities for a Better Environment v. South Coast Air Quality Management Dist.* (2010) 48 Cal.4th 310).

The Draft EIR calculates the Proposed Project's operational emissions and makes two comparisons (Comparisons A and B). In Comparison A, the Proposed Project's operational emissions at the expected buildout scenario (year 2028) calculated with 2028 emission factors for on-road mobile sources are compared to the existing baseline conditions (year 2018) calculated with 2018 emission factors for on-road mobile sources. In this comparison, the Proposed Project would result in long-term significant adverse air quality impacts on regional emissions from NOx, SOx, PM10, and PM2.5, but not from VOCs. The Draft EIR uses the results from Comparison A to determine the significance level for the Proposed Project's regional air quality impacts during operation. However, when the future conditions are used (Comparison B), the Proposed Project would result in long-term significant adverse air quality impacts on regional VOCs emissions, but not on regional NOx, SOx, PM10, and PM2.5 emissions. The Draft EIR includes the results from Comparison B for informational purposes only and does not use them to determine the significance level for the Proposed Project's regional air quality impacts during operation.

The Draft EIR's approach using Comparison A between the Proposed Project's emissions in the future year (using emission rates from year 2028) and the emissions from the baseline (using emission rates from year 2018) improperly credits the Proposed Project with emission reductions that will occur independently of the Proposed Project due to adopted federal and state rules and regulations on clean vehicles and fuel technologies,

since these rules, regulations, and technologies are expected to reduce mobile source emissions and improve air quality over time, even in the absence of the Proposed Project. For example, the California Air Resources Board's (CARB) current regulation for trucks and buses will provide significant near-term and long-term reductions in NOx emissions from trucks and buses, at 98 tons per day for 2023[15].

Using future conditions is reasonable and proper to determine the significance level for the Proposed Project's operational air quality impacts based on the change in activities due to the Proposed Project. Since the Draft EIR has already performed the air quality analysis based on future conditions with the Proposed Project and without the Proposed Project (Comparison B), the Final EIR should use it to determine the significance level for the Proposed Project's regional air quality impacts during operation, or provide an explanation on the rationale for selecting Comparison A for a CEQA significance determination purpose but not selecting Comparison B when Comparison B shows the Proposed Project will have a significant adverse air quality impact on regional VOCs emissions.

[15] California Air Resources Board. July 14, 2017. Trucks and Bus Regulation: On-Road Heavy-Duty Diesel Vehicles (In-Use) Regulation. Accessed at:
https ://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm, and
https://www.arb.ca.gov/msprog/onrdiesel/documents/truckrulehealth.pdf.

Response: The commenter suggests that the operational emissions with the proposed Project in 2028 should be compared to the operational emissions without the proposed Project in 2028 to determine the level of significance of the proposed Project's air quality impacts. The rational for the selection of the Environmental Baseline is laid out in the introduction to Chapter 4 of the Draft EIR, on pages 4-2 through 4-4. As noted therein, Section 15125(a)(1) of the State CEQA Guidelines identifies different ways in which a lead agency may define "existing conditions" for purposes of identifying the appropriate baseline against which to measure a proposed project's impacts and states that "[g]enerally, the lead agency should describe physical environmental conditions as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective." The Notice of Preparation (NOP) for the Draft EIR was published on April 4, 2019. In accordance with the provisions of CEQA, LAWA selected 2019 as the baseline year for characterizing existing physical conditions in the environmental analysis. For the analysis of certain operational impacts, a full year's worth of operational data for LAX was considered necessary and appropriate to characterize existing baseline conditions, since the operational characteristics of LAX, especially in terms of aircraft operations, vary throughout the year based on seasonal travel and holiday travel. Therefore, LAX operational data for all of 2018, the calendar year prior to the release of the NOP, were used to define existing baseline conditions for the evaluation of potential impacts related to aircraft-related air pollutant and greenhouse gas (GHG) emissions, as well as aircraft noise.

The commenter asserts that the Final EIR should use the future conditions baseline to determine the significance level for the proposed Project's regional air quality impacts

during operation. As noted by the commenter, page 4.1.1-34 of the Draft EIR acknowledges that "the Project-related incremental emissions (i.e., the emissions of the proposed Project in 2028 compared to 2018 baseline conditions) would be influenced by factors that are not attributable to the Project itself. Specifically, Project-related incremental emissions contain future emissions from background growth in passengers and aircraft operations that are projected to occur with or without the Project. The incremental emissions also account for lower emission factors for motor vehicles from improved engine technology. In order to remove the influence of background growth and the differences in motor vehicle emission factors between 2018 and 2028, a second comparison is provided of emissions from the proposed Project in 2028 (2028 With Project) and emissions from the Future Without Project scenario in 2028 (2028 Without Project). The difference between these two scenarios highlights the air pollutant emissions impacts of the proposed Project compared to future emissions that are estimated to occur without the Project. This comparison is made for informational purposes only; the significance of the Project impacts is not based on this comparison." This approach is consistent with Section 15125(a)(1) of the State CEQA Guidelines, which states that "a lead agency may also use baselines consisting of both existing conditions and projected future conditions that are supported by reliable projections based on substantial evidence in the record."

Using the 2018 environmental baseline, LAWA reported significant operational emission impacts to air quality for nitrogen oxides (NOx), sulfur oxides (SOx), inhalable particulate matter (PM10), and fine particulate matter (PM2.5) (see Table 4.1.1-10 of the Draft EIR). Comparing future conditions in 2028 without the proposed Project, only volatile organic compounds (VOC) would exceed the threshold (see Table 4.1.1-11). As noted on page 4-3 of the Draft EIR, Section 15125(a)(2) of the State CEQA Guidelines provides that a lead agency "may use projected future conditions … baseline as the sole baseline for analysis … if it demonstrates with substantial evidence that use of existing conditions would be either misleading or without informative value to decision-makers and the public. Use of projected future conditions as the only baseline must be supported by reliable projections based on substantial evidence in the record." There is no evidence that use of an existing conditions baseline for the air quality analysis would be misleading or without informative value to decision-makers and the public. For this reason, with respect to the analysis of operational air quality impacts, the EIR follows the typical approach authorized by State CEQA Guidelines Section 15125 and determines whether impacts would be significant by measuring the proposed Project's emissions against the existing environmental setting as reflected in the EIR. This approach is also consistent with guidance provided by the commenter.[1]

The commenter expresses the concern that the analysis of the proposed Project's air quality impacts takes into account anticipated improvements in air quality due to the implementation of adopted regulations that are expected to lower emissions from on-road mobile sources. The commenter is concerned that this approach may "credit" the Project for improvements in air quality that will occur without regard to the proposed Project. The analysis does not attempt to give the proposed Project credit for reduced air pollutant emissions resulting from these regulations. Rather, the analysis represents LAWA's best efforts to forecast emissions that will occur in 2028, when the proposed Project becomes operational. Because the regulations cited by the commenter have

been approved, it is appropriate that the analysis account for the effect of those regulations. (See *Cadiz Land Co. v. Rail Cycle* (2000) 83 Cal.App.4th 74 [analysis of air pollutant emissions from locomotives took into account reductions in emissions that would occur due to regulatory requirements].) The commenter is correct that reductions in emissions due to the implementation of mobile source emission regulations are not attributable to the proposed Project, but to the implementation of those regulations. However, at the same time, by using a 2018 environmental baseline to determine the significance level for the proposed Project's operational air quality impacts, the analysis attributes impacts to the proposed Project from background growth in passengers and aircraft operations that are projected to occur even though that background growth is not attributable to the proposed Project. As shown above, on balance, when using the 2018 environmental baseline, impacts of the proposed Project are greater than they would be if a future conditions baseline were used.

In summary, use of an existing conditions baseline was more conservative for the purpose of the air quality operational emissions analysis and, therefore, was used to determine the significance of operational air pollutant emission impacts in the Draft EIR. The comparison of proposed Project impacts in 2028 to 2028 conditions without the proposed Project baseline provided in the Draft EIR fulfilled the EIR's role as an informational document and fully disclosed the influence of lower emission factors for motor vehicles from improved engine technology.

[1] South Coast Air Quality Management District, CEQA Air Quality Handbook, page 7-1, April 1993.

ATMP-AR003-11

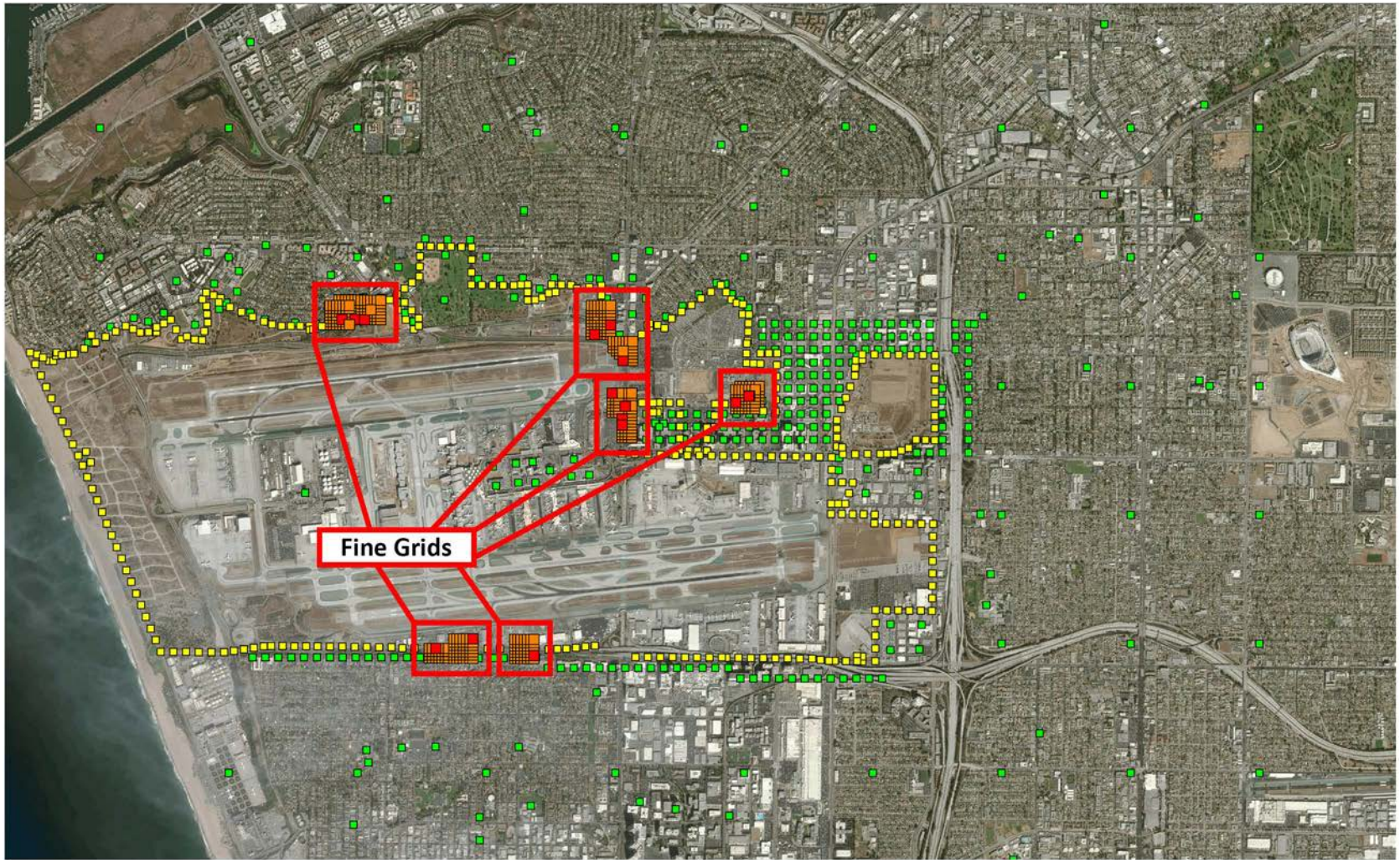
Comment: 2. Air Dispersion Modeling Parameter

To analyze the Proposed Project's localized air quality impacts and HRA, the Draft EIR performs project-specific air dispersion modeling. The Draft EIR states that sensitive receptor locations were determined in a manner that would identify peak ambient air pollutant impacts associated with the Proposed Project[16]. The Draft EIR also states that initial off-site sensitive receptors will have a 100-meter spacing, and that refined sensitive receptors will be placed immediately around the initial impact location using a 25-meter spacing to verify the ultimate peak concentrations have been identified[17]. Based on a review of the air dispersion modeling files, South Coast AQMD staff found that sensitive receptors are placed at the fence line with a 100-meter spacing, that a uniform Cartesian receptor grid with a spacing of 100 meters is used to the northeast of the LAX property boundary over the rental car facility, and that various discrete receptors are placed beyond the LAX property boundary (see Figure 1). The receptor grid that is placed to the northeast of the LAX property boundary might not have been large enough to identify the maximum off-site concentrations. Therefore, South Coast AQMD staff recommends that the Final EIR provide additional information to justify the receptor grid used or perform additional modeling with an expanded receptor grid.

[16] Draft EIR. Section 4.1.1. Pages 4.1.1-14.
[17] Ibid. Appendix C. Section 4. Page 4-4

Response: As described in Section 4.1.1.2.5 of the Draft EIR, a set of receptors, composed of LAX property line receptors, community receptors in the vicinity of the airport, and CTA receptors, was developed such that the peak ambient air pollutant impacts associated with the proposed Project would be identified. Additionally, as described in Section 4.6 of the LAX Airfield and Terminal Modernization Project Final CEQA Protocol for Conducting an Air Quality Impact Analysis of Criteria Air Pollutants, included in Appendix C.8 of the Draft EIR, refined receptors were placed immediately around the peak impact locations identified in the base receptor set for the proposed Project. Refined receptors were placed in 25-meter fine spacings out to a 100-meter radius (the distance between receptors in the base receptor set) to verify that the ultimate peak concentrations were identified. Figure 1 of this response identifies all receptors included across the base receptor set and refined receptor set evaluated in the Draft EIR. The receptor grid to the northeast of the property line adequately captures the peak impacts because concentrations would be highest near the runway ends (and thus, the property line) and proposed roadway improvements. Traffic volumes (and related emissions) and aircraft emissions would generally decrease with distance from the property line, which would also result in lower air pollutant concentrations.

As shown in Figure 1, peak impacts identified with the base receptor set were located along the airport fence-line, with the exception of particulate matter impacts, which were located near the future Intermodal Transportation Facility – West (ITF West) being constructed as part of the LAX Landside Access Modernization Program. Figure 2 of this response identifies the locations of fine grid areas and the associated pollutants analyzed for each area. The particulate matter (PM10 and PM2.5) peak impact location



0 1,500 3,000 Feet

Scale

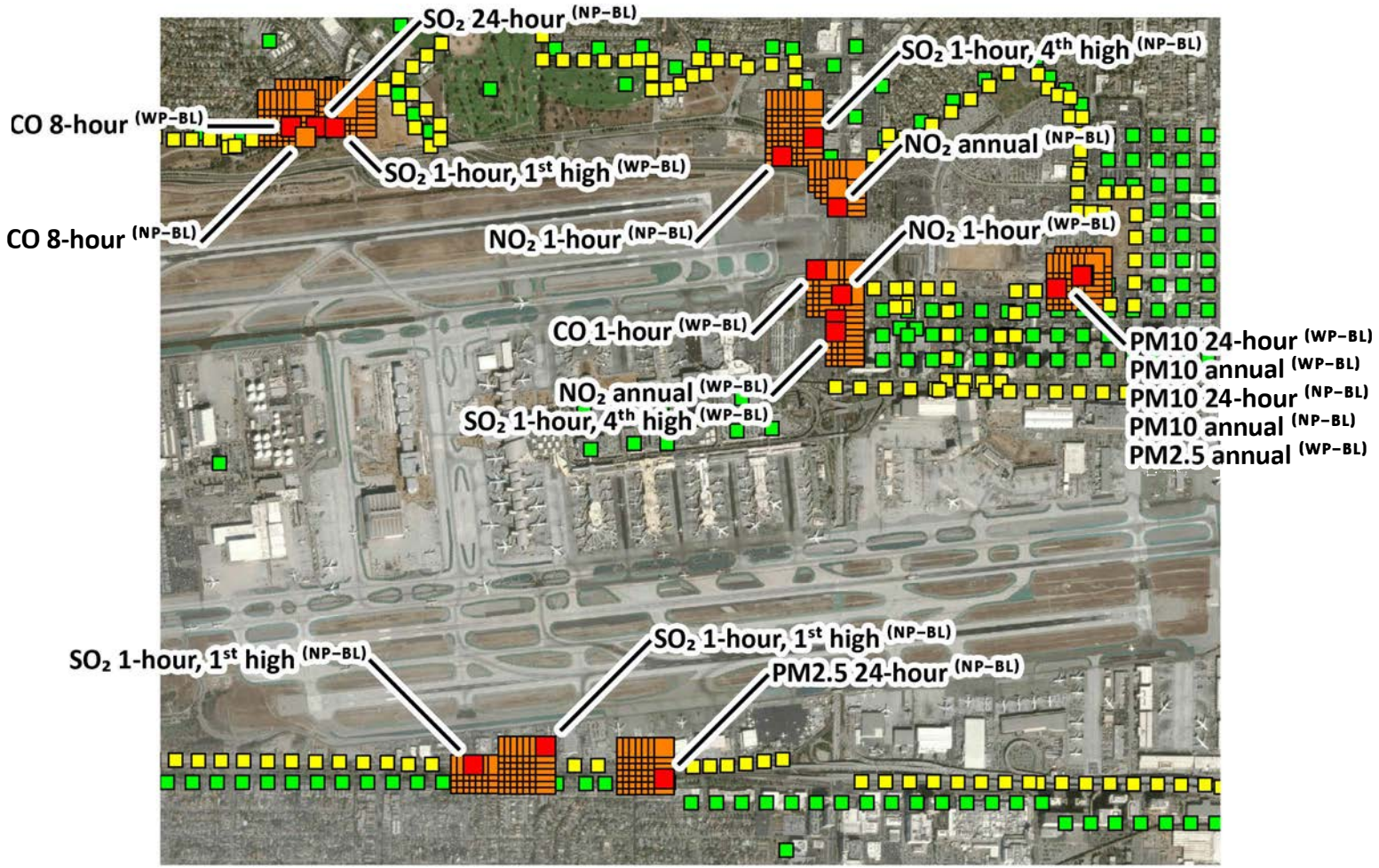
Source: USEPA AERMOD, June 2021

Prepared by: CDM Smith, June 2021

Legend

- LAX Property Line Receptors
- Coarse Grid and Discrete Receptors
- Fine Grid Receptors

LAX Airfield and Terminal Modernization Project	Coarse Grid, Fenceline, and Fine Grid Receptors Analyzed in the Draft EIR	Figure **1**



0 2,750 5,500 Feet

Scale

Source: USEPA AERMOD, June 2021

Prepared by: CDM Smith, June 2021

Legend

- Traffic line-volume source
- LAX Property Line Receptors
- Coarse Grid and Discrete Receptors
- Fine Grid Receptors
- Ultimate Peak Receptors

LAX Airfield and Terminal Modernization Project	Refined Receptor Sets and Ultimate Peak Impact Locations	Figure 2

would be dominated by paved road dust from vehicle traffic going to and from the ITF West, which is under construction. The incremental change in PM10 and PM2.5 between 2028 with the proposed Project and the 2018 Baseline is due primarily to the increase in vehicle miles traveled (VMT) between 2018 and 2028. In general, the other fine grid locations address the various gaseous pollutant peaks. These are generally dominated by aircraft activity on the airfield and are located on and next to the fence-line around LAX.

Overall, the receptors modeled for the Draft EIR capture the peak impacts associated with the Project and additional modeling is not required.

ATMP-AR003-12

Comment: 3. Responsible Agency and South Coast AQMD Permits

The Draft EIR states that South Coast AQMD has authorities to issue permits to construct and permits to operate for stationary sources[18]. The Draft EIR also includes a discussion of South Coast AQMD Rules, including Rule 403 – Fugitive Dust[19] and Rule 1113 – Architectural Coatings[20].

Based on a review of the Draft EIR, the Proposed Project will use rock crushing equipment during construction, and emergency generators, fire hydrant technologies, and fuel storage tanks during operation. If permits from South Coast AQMD are required, South Coast AQMD should be identified as a Responsible Agency in the Final EIR (CEQA Guidelines Section 15381). If additional stationary equipment will require permits from South Coast AQMD, the Final EIR should identify them in the Project Description and Air Quality Sections, where appropriate (e.g., if a Jet A fuel storage tank has a liquid fuel storage capacity greater than 40,000 gallons, a South Coast AQMD permit may be required pursuant to South Coast AQMD Rule 219[21]). The assumptions in the air quality analysis in the Final EIR will be the basis for evaluating the permit under CEQA and imposing permit conditions and limits. Questions on permits can be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385. For more general information on permits, please visit South Coast AQMD's webpage[22].

[18] Draft EIR. Section 2. Page 2-85.
[19] South Coast AQMD Rule 403 – Fugitive Dust. Accessed at: http://www.aqmd.gov/docs/default-source/rule-book/outdated-sip-rules/rule-403-fugitive-dust.pdf.
[20] South Coast AQMD Rule 1113 – Architectural Coatings. Accessed at: http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf.
[21] South Coast AQMD Rule 219 – Equipment not Requiring A Written Permit Pursuant to Regulation II. Accessed at: http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-219.pdf.
[22] South Coast AQMD. Permits. Accessed: http://www.aqmd.gov/home/permits.

Response: This comment states that SCAQMD should be identified as a Responsible Agency in the Final EIR. In accordance with Section 15124(d)(1) of the State CEQA Guidelines, the SCAQMD's authority to issue permits to construct and permits to operate stationary sources is identified in the listing of state and regional actions included in Section 2.8.2 of the Draft EIR. Moreover, throughout the CEQA process, LAWA has met the requirements of CEQA and the State CEQA Guidelines pertaining to the treatment of responsible agencies, including SCAQMD. For example, LAWA notified SCAQMD of the scoping meeting in accordance with Section 20183.9(b)(2) of the Public Resources Code and provided electronic copies of the Draft EIR to the State Clearinghouse and directly to SCAQMD, exceeding the requirements of Section 21082.1(c)(4) of the Public Resources Code. With respect to specific permits that may be required from SCAQMD, page 4.1.1-24 identifies that the proposed Project would potentially add new combustion equipment for space heating, water heating, and emergency power generation and notes that SCAQMD permits under Regulation II – Permits and Regulation XXX – Title V Permits would apply to new stationary equipment associated with the proposed Project facilities. In addition, page 4.1.1-18 of the Draft EIR notes that LAWA has an existing permit for the on-airport concrete batch plant that would be used for proposed Project concrete demand.

ATMP-AR003-13

Comment: Conclusion
Pursuant to California Public Resources Code 21092.5(a) and CEQA Guidelines 15088(b), South Coast AQMD staff requests that LAWA provide South Coast AQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and to the public who are interested in the Proposed Project.

Response: In compliance with CEQA and the State CEQA Guidelines (Public Resources Code Section 21092.5; State CEQA Guidelines Section 15088), LAWA has provided South Coast AQMD with responses to its comments at least 10 days prior to consideration of Final EIR for certification by the Board of Airport Commissioners. Responses to the issues raised by South Coast AQMD are provided in Responses to Comments ATMP-AR003-2 through ATMP-AR003-12, above. In accordance with State CEQA Guidelines Section 15088, these responses are thorough, detailed, and provide good faith, reasoned analyses supported by factual information. These responses are provided herein as part of this Final EIR. Comments received on the Draft EIR, and responses to those comments, will be included in the record of proceedings available to the decision-makers during project deliberations.

ATMP-AL001 Mitnick, Scott City of El Segundo 10/30/2020

ATMP-AL001-1

Comment: The City of El Segundo ("City") hereby requests an extension of the deadline for public comments on the Los Angeles International Airport Airfield & Terminal Modernization Project Draft Environmental Impact Report ("DEIR"). Public comments on the DEIR are currently due on December 14, 2020. The City requests that the due date be extended to April 30, 2021. This would give the public just over 180 days from the October 29, 2020 release date in which to prepare comments on the DEIR.

This extension is warranted due to the voluminous nature of the DEIR as well as the magnitude and complexity of the environmental impacts associated with the Project, which encompasses two brand-new passenger terminals, multiple taxiway and other airfield improvements, and substantial on- and off-airport circulation improvements. As LAWA's website continues to show as of the date of this letter, the DEIR was originally supposed to be released in the First Quarter of 2020, yet LAWA has taken several additional months to prepare the document. We understand that, to the extent this delay was caused by the coronavirus pandemic, this was largely out of LAWA's control. At the same time, the public is equally impacted by the burdens of the pandemic in terms of its ability to meaningfully comment on this voluminous document in a timely manner. The Thanksgiving holiday will also interfere with the public's ability to review and comment on the DEIR in the short timeframe provided. As a result, the bare statutory minimum of 45 days is insufficient for a Project of this significance. The impacted adjacent residents and communities deserve ample time to review and respond.

Thank you for your consideration of this request. I would appreciate receiving a response at your earliest convenience. Please do not hesitate to call at (310) 524-2301 or email at smitnick@elsegundo.org.

Response: On October 29, 2020, LAWA published the Draft EIR for the proposed LAX Airfield and Terminal Modernization Project. In accordance with the State CEQA Guidelines, the Draft EIR was originally circulated for public review for 47 days (two days more than the required minimum 45 days), with the review period originally closing on December 14, 2020. A virtual open house was launched on November 25, 2020 that provided detailed information about the proposed LAX Airfield and Terminal Modernization Project and the Draft EIR analysis. LAWA also held a virtual public meeting on December 1, 2020 that provided stakeholders with a presentation on the proposed Project and the Draft EIR analysis, as well as an opportunity for questions and answers. The comment period for the Draft EIR was extended twice due to requests from the community and neighboring jurisdictions, including the City of El Segundo. It was initially extended by 60 days to February 12, 2021, and then extended again for an additional 31 days, for a total comment period of 138 days, with the comment period closing on March 15, 2021. LAWA determined that the two extensions of the comment review period, which resulted in a comment period that was more than triple the review time required by CEQA, coupled with the virtual open house and virtual public meeting described above, provided adequate time and information for public review of the Draft EIR. Under CEQA, "[t]he public review period for a draft EIR shall not be less than 30 days nor should it be

longer than 60 days except under unusual circumstances. When a draft EIR is submitted to the State Clearinghouse for review by state agencies, the public review period shall not be less than 45 days, unless a shorter period, not less than 30 days, is approved by the State Clearinghouse." (State CEQA Guidelines Section 15105(a).) As set forth above, in this case, LAWA provided a public review period that is more than twice as long as the extended, 60-day period suggested by this Guideline.

ATMP-AL002 Mitnick, Scott City of El Segundo 1/12/2021

ATMP-AL002-1

Comment: The City of El Segundo ("City") hereby requests a second extension of the deadline for public comments on the LAX Airfield & Terminal Modernization Project Draft Environmental Impact Report ("DEIR"). El Segundo requests that the due date be extended by 60 days to April 13, 2021, from the current deadline of February 12, 2021.

On November 24, 2020, the City's outside counsel submitted, on behalf of the City, a request under the California Public Records Act for seven categories of records necessary to conduct a meaningful review of the DEIR. By follow up on December 22, the City's outside counsel informed LAWA that if LAWA did not provide a complete response by January 1, 2021, we would need additional time to prepare our comments.

As of the date of this letter, LAWA has provided only partial responses to fewer than half of our requests. Insufficient time remains before the comment deadline to ensure that the City receives, and can meaningfully review, public records that will inform its DEIR comments. The City therefore asks for a deadline extension to April 13. Thank you for your consideration.

Response: Please see Response to Comment ATMP-AL001-1 regarding the public comment period for the Draft EIR. As noted in that response, LAWA extended the public comment period twice. With these extensions, the total comment period was 138 days, closing on March 15, 2021. LAWA made a good faith effort to provide responses to the City of El Segundo's November 24, 2020 request under the California Public Records Act in a timely manner. Information related to this request was provided to the City of El Segundo on or before February 1, 2021, with the exception of one document, identified in a December 22, 2020 letter from the City of El Segundo, which LAWA was still attempting to locate. Due to an error in El Segundo's description of the document it sought, LAWA was unable to locate the document requested in the December 22, 2020 letter despite a diligent search. However, LAWA was subsequently able to locate a document by a similar name, which it provided to El Segundo on March 1, 2021. As noted above, LAWA provided a second extension of the comment period to March 15, 2021. All documents requested in the City's November 24, 2020 request were provided before the close of the comment period.

ATMP-AL003 Mitnick, Scott City of El Segundo 2/18/2021

ATMP-AL003-1

Comment: The City of El Segundo ("City") hereby requests a third extension of the deadline for public comments on the LAX Airfield & Terminal Modernization Project Draft Environmental Impact Report ("DEIR"). El Segundo requests that the due date be extended by 30 days to April 14, 2021, from the current deadline of March 15, 2021.

On November 24, 2020, the City's outside counsel submitted a request under the California Public Records Act ("PRA") for records necessary to conduct a meaningful review of the DEIR. By follow up on December 22, counsel informed LAWA that if LAWA did not provide a complete response by January 1, 2021, we would need additional time to prepare our comments. Although LAWA subsequently extended the comment deadline to March 15, LAWA still has not completed its response to this request (see attached February 11, 2021 message from Georgianna Streeter).

Furthermore, on February 1, El Segundo submitted a PRA request for records that are referenced by documents LAWA provided in response to the November 24 request. All of the requested documents are material to El Segundo's review of and response to the ATMP Draft EIR. LAWA replied that it will need an unspecified amount of time to respond to this request (see attachment).

Based on the foregoing, insufficient time remains before the comment deadline to ensure that the City receives, and can meaningfully review, public records that will inform its DEIR comments. The City therefore asks for a deadline extension to April 14. Thank you for your consideration.

Response: Please see Response to Comment ATMP-AL001-1 regarding the public comment period for the Draft EIR. As noted in that response, LAWA extended the public comment period twice. With these extensions, the total comment period was 138 days, closing on March 15, 2021. LAWA made a good faith effort to provide responses to the City of El Segundo's November 24, 2020 and February 1, 2021 requests under the California Public Records Act in a timely manner. As noted in Response to Comment ATMP-AL002-1, the preponderance of the information produced by LAWA in response to the November 24, 2020 request was provided to the City of El Segundo on or before February 1, 2021 with the exception of one document that was determined not to exist as described by El Segundo, though a document with a similar name was provided on March 1, 2021, prior to the March 15, 2021 close of the comment period. Information related to the February 1, 2021 request was provided to the City of El Segundo between March 10 and March 12, 2021, also prior to the close of the comment period.

ATMP-AL004	**Brand, Mayor William**	**City of Redondo Beach**	**3/11/2021**

ATMP-AL004-1

Comment: On behalf of the City of Redondo Beach, California, please accept this letter as the City's official written comments on the Draft Environmental Impact Report for the Los Angeles World Airports' LAX Airfield and Terminal Modernization Project. The City respectfully submits these comments to LAWA, as the Lead Agency for the project.

As a community in the vicinity of the ATMP, the City of Redondo Beach has the following concerns:

1. Expansion Projects/Impacts of Growth. The DEIR under the "Growth in LAX Passenger Activity Levels" section states that future increases in passenger activity levels at LAX would occur with or without the proposed project. The DEIP claims that improvements, including the development of passenger gates at Concourse O and Terminal 9, are not anticipated to result in growth in LAX passenger activity levels beyond what is expected to occur without the proposed project.

Although the DEIR reports that through 2028 the growth projections are the same for constrained versus unconstrained forecasts, in 2029 and thereafter the airport congestion is expected to constrain growth. Yet, the project is integral to hosting the 2028 Olympic and Paralympic Games," ... with LAX serving as the main portal for athletes, dignitaries, and visitors around the world." Without these facility improvements that would increase taxiway operational safety and effectiveness, eliminate passenger busing inefficiencies, and accommodate more gates for more commercial flights, would the current facilities accommodate the 2028 expected utilization for the Olympic and Paralympic Games? If these improvements are necessary for the forecasted growth to happen, including an expected swell in 2028, where otherwise the safety would be compromised with the existing configuration of the taxiway or the passenger experience would be deteriorated from crowded terminals and gates such that travelers would choose to travel through other regional airports, then the clarification should be made that this is more than just enhancing the travelers' experience. With airfield safety limitations and the existing number of gates, induced growth impacts should be analyzed for the project, where the runway system is being significantly enhanced and there will be a net increase of 9-12 readily-accessible gates. Any necessary mitigation measures to address significant environmental impacts from the induced growth should be included in the Final EIR. This includes the additional noise from increased flight activity resulting from the induced growth, including flight activity over neighboring communities such as Redondo Beach.

Response: LAWA thanks the City of Redondo Beach for its review of the Draft EIR. Please see Response to Comment ATMP-AL010-285 for a discussion of the ability of LAX to accommodate forecasted demand in 2028, including the 2028 Olympic and Paralympic Games, without the proposed Project improvements. As documented, the Draft EIR did not suggest that hosting the events would not be feasible without the proposed Project improvements. Rather, as discussed in Section 2.3.2.2 of the Draft EIR, the proposed

Project improvements would improve passenger experience, reduce busing activity among facilities, improve international and domestic passenger processing capabilities, and immigration and customs processes. All these improvements are integral to ensure that passengers traveling to attend the 2028 Olympic and Paralympic Games have a safe and positive customer experience through LAX. As documented in Section 4.3 of Appendix B.1 of the Draft EIR, the 2028 Design Day Flight Schedule was successfully gated under both the No Project and the proposed Project scenarios. Therefore, the Draft EIR did not suggest that the 2028 Olympic and Paralympic Games would not be able to be accommodated without the proposed Project improvements.

Further, the Draft EIR did not suggest that "safety would be compromised with the existing configuration of the taxiway" without the proposed Project improvements, or that "airfield safety limitations" exist, as asserted by the commenter. As documented in Section 2.4.1.2 of the Draft EIR, the proposed Project airfield improvements would enhance safety and operational flexibility and management of the airfield by improving the airfield system (particularly runway exits and portions of the taxiway system). The current LAX airfield layout has been approved by the FAA during their review and approval process of the Airport Layout Plan.[1]

Contrary to the commenter's assertion, potential induced growth was analyzed and documented in the Draft EIR, including in Section 6.3.2, Growth in LAX Passenger Activity Levels. Additionally, Section 3 of Appendix B.2 of the Draft EIR documents the airfield simulations conducted to assess potential differences between the proposed Project scenario and the No Project scenario. Please see Response to Comment ATMP-AL010-205 for a discussion regarding differences in operational conditions resulting from the proposed Project improvements (e.g., runway occupancy times, in-trail aircraft separation, operating configurations, etc.) As documented, the proposed Project improvements would not directly or indirectly induce growth at LAX. Please see Topical Response TR-ATMP-G-1 for further discussion of the validity of LAWA's aviation forecast. Accordingly, the Draft EIR adequately analyzed environmental impacts, including aircraft noise potential impacts, which is documented in Chapter 4.7.1 of the Draft EIR, which concluded there would be no significant noise impacts to Redondo Beach.

[1] City of Los Angeles, Los Angeles World Airports, Airport Layout Plan – Existing Layout Plan Sheet, January 17, 2020.

ATMP-AL004-2

Comment: 2. Temporary Impacts. The proposed new terminal (known as Terminal 9) will be the first terminal located east of Sepulveda Boulevard. This represents a major expansion of the central terminal area footprint. Although it is intended to be accessed from Century Boulevard, LAWA is proposing temporary access from Sepulveda Boulevard as well. The concern is that the draft EIR does not adequately evaluate impacts to motorists in the South Bay. Although CEQA may not require it, LAWA should consider the traffic congestion on the critical thoroughfares that would result from this temporary access from Sepulveda Boulevard. Alternatively, LAWA should delay the opening of Terminal 9

until the roadways intended to serve the project are completed. This would eliminate the need for any access from Sepulveda to Terminal 9 and would ensure that the Sepulveda Tunnel and other local streets are not subjected to frequent gridlock conditions, spreading impacts into nearby South Bay communities.

Response: Please see Response to Comment ATMP-AL007-8 regarding the temporary nature of the subject interim access and as related to concerns regarding traffic congestion. Please also see Response to Comment ATMP-AL010-235 regarding potential safety concerns.

ATMP-AL004-3

Comment: 3. Cargo Operations. This project does not seem to directly address cargo operations. The DEIR mentions that the replacement of the cargo operations will occur independently from the proposed project. The City of Redondo Beach is concerned that any increased capacity for cargo operations are not compatible with the densely populated South Bay area. To any extent that this project expands cargo operations, the City of Redondo Beach requests that other airports in the region be considered to serve this need instead.

Response: As described in Section 2.5.1, particularly in Table 2-4, of the Draft EIR, existing cargo facilities, or portions thereof, that are displaced by development of proposed Project elements would be subject to on-site consolidation or relocation to other facilities at LAX. The proposed Project does not propose any new cargo facilities and would not increase the capacity for cargo operations at LAX.

ATMP-AL005	**Mihranian, Ara Michael**	**City of Rancho Palos Verdes**	**3/15/2021**

ATMP-AL005-1

Comment: Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR). The City of Rancho Palos Verdes, herein the City, is a quiet coastal town on the Palos Verdes Peninsula, approximately 11 miles south of the Los Angeles International Airport (LAX), but near eastbound aircraft pathways departing from LAX. In review of the DEIR for the LAX Airfield & Terminal Modernization Project (ATMP), the City wishes to express the primary concern that the ATMP will result in an increase in aircraft noise pollution caused by eastbound passenger jets overflying the airspace above the Palos Verdes Peninsula.

As you may know, this community and the rest of the Palos Verdes Peninsula has a long history of expressing concerns to Los Angeles World Airports (LAWA) and the Federal Aviation Administration (FAA) regarding noise impacts associated with departing passenger aircraft from LAX. The City is an active participant on the LAX Roundtable and has made exhaustive requests to the FAA to curb passenger jet aircrafts being vectored by FAA air traffic controllers (ATC) over the Peninsula. Despite these repeated requests

to simply adhere to the approved flight paths, the Peninsula continues to suffer from noisy passenger jet overflights originating from LAX.

Response: LAWA thanks the City of Rancho Palos Verdes for its review of the Draft EIR. As shown in Figure 4.7.1-7 of the Draft EIR, The Palos Verdes Peninsula does not fall within the existing or future (2028) 65 CNEL contours and, therefore, would not be impacted by the proposed Project. Additionally, as stated in Section 4.7.1.3.1.3 of the Draft EIR, although LAWA has negotiated a series of preferred operating procedures for LAX intended to ease noise impacts, the FAA has the final determination of where aircraft fly, and the procedures do not abrogate the authority and responsibility of the pilot in command with respect to the safe operation of the aircraft. As such, the preferred forum for addressing noise concerns over the Palos Verdes Peninsula is the LAX Community Roundtable. The LAX Community Roundtable has taken action to address noise concerns expressed by the City of Ranchos Palos Verdes and provides a quarterly statistical update that includes analysis of departures over Palos Verdes Peninsula. This can be accessed via LAWA's Community Roundtable website, under "Presentations & Other Materials.[1]

[1] Los Angeles World Airports, Community Noise Roundtable. Available: https://www.lawa.org/lawa-environment/noise-management/lawa-noise-management-lax/community-noise-roundtable, accessed April 27, 2021.

ATMP-AL005-2

Comment: General Comments

1. In general, the City is concerned that the ATMP will induce more passenger flights departing from LAX, thus, increasing the likelihood that air traffic controllers will "cut the corner" and improperly and against FAA procedures (OSHNN8), vector additional aircraft at low altitudes over the Palos Verdes Peninsula's airspace. This has been, and continues to be an issue, additional flight will only exacerbate the issue and increase its likelihood.

Response: Implementation of the proposed Project would not induce more passenger flights departing from LAX. As discussed on page 4.7.1-16 in Section 4.7.1.2 of the Draft EIR, the change in future (2028) aircraft noise conditions compared to existing baseline conditions is attributable to growth in passenger activity and aircraft operations that is anticipated to occur at LAX by 2028 with or without the proposed Project. In other words, the proposed Project itself would have no effect on noise levels associated with aircraft operations; rather, the change in noise levels from 2018 to 2028 aircraft operations will be entirely attributable to growth in aviation activity that will occur with or without the proposed Project. Please see Topical Response TR-ATMP-G-1 regarding the aviation demand forecast and future aviation activity at LAX.

Additionally, as discussed in Response to Comment ATMP-AL005-1, operations at LAX must follow the negotiated operating procedures, unless the FAA determines that weather or airport/air traffic operational conditions require deviation from those

procedures. Moreover, the procedures do not abrogate the authority and responsibility of the pilot in command with respect to the safe operation of the aircraft. Thus, the FAA, not LAWA, has the final determination of where aircraft fly. Lastly, the law presumes that LAWA and the FAA will follow required procedures, and the EIR need not speculate on the possibility of future circumstances where the FAA determines that deviation from the LAX Noise Abatement Procedures is necessary. (State CEQA Guidelines Section 15145; see *Riverwatch v. County of San Diego* (1999) 76 Cal.App.4th 1428, 1452-1453; *Eureka Citizens for Responsible Government v. City of Eureka* (2007) 147 Cal.App.4th 357, 370 ["preparation of an EIR is not generally the appropriate forum for determining the nature and consequence of prior conduct"].)

ATMP-AL005-3

Comment: 2. The City also shares the concerns that have been expressed in separate correspondence by partner cities and the South Bay Cities Council of Governments (SBCCOG). We share the concern that LAWA needs to prioritize efforts to disperse air traffic to their other regional airports. Without a coordinated plan to disperse infrastructure improvements to other local airports, LAX is guaranteed to see an accelerated growth of air traffic activity. This increase in air traffic activity will inevitably result in noisy air traffic near and over the Peninsula, increased traffic congestion, additional local air pollution concentrations and other negative unintended consequences.

Response: Please see Responses to Comments ATMP-AR002-2 and ATMP-AL007-3 regarding other regional airports in relation to LAX and the LAX Airfield and Terminal Modernization Project Draft EIR.

ATMP-AL005-4

Comment: Specific Comments

1. In reference to Section 2.3.1.2, the City questions the DEIR's projected air traffic passenger growth data, since the LAWA's study was done prior to the outset of the COVID-19 pandemic. LAWA should reconsider the projected growth in light of changes to pandemic-induced passenger travel behavior and reconsider the projected growth at other airports and those airports' ability to handle the projected growth.

Response: Please see Topical Response TR-ATMP-G-1 regarding the aviation demand forecast for LAX and the COVID-19 pandemic context. As documented in the topical response, uncertainties associated with the severity and duration of the contraction in aviation activity resulting from the COVID-19 global pandemic still exist in mid-2021. However, LAX has recently shown signs of post-pandemic recovery. The Draft EIR evaluates and discloses the impacts of the proposed Project when it would be fully operational in the buildout year of 2028. As a result of the COVID-19 pandemic, impacts analyzed in the Draft EIR are most likely commensurate to higher levels of activity than will actually occur in 2028. Thus, the Draft EIR's analysis of impacts related to passenger activity levels

in 2028 can be considered conservative. Further, there is no evidence that other airports' ability to handle projected growth was impacted by the COVID-19 pandemic in any way that would impact the Draft EIR's aviation activity forecast. Therefore, the aircraft operation and passenger forecasts prepared for the Draft EIR do not need to be revised.

ATMP-AL005-5

Comment: 2. In reference to Section 4.4, the City encourages LAWA to consider expanding the scope of study for greenhouse gas emissions based on projected aircraft departures from LAX under known aircraft dispersal patterns. Specifically, air pollutants should be studied, which are emitted from passenger jets vectored over the Palos Verdes Peninsula. The toxic air contaminants of concern should be studied over exposed populations based on the quantity and altitudes of passenger jet with Peninsula overflights. LAWA should consider a range of mitigation measures available to lessen passenger jet air pollution over Peninsula residents, including effective communication with TRACON air traffic controllers to vector passenger jets over the ocean east of the HOLTZ waypoint.

Response: As discussed in Section 4.1.1.2.3.1 of the Draft EIR, aircraft emissions were estimated for operations up through the local mixing height. The mixing height, as described by the Federal Aviation Administration (FAA), "…is the top of the vertical region of the atmosphere in which pollutant mixing occurs and affects ground level concentrations. Above this height, pollutants that are released generally do not mix with ground level emissions and do not have an effect on ground level concentrations in the local area".[1]

The Base of Aircraft Data (BADA) version 3 aircraft performance database incorporated in FAA's AEDT 3b software indicates that typical commercial passenger aircraft, such as the Airbus A320, have a rate of climb ranging from 1,800 to 2,600 feet per minute and speeds ranging from 140 to 170 knots (2.7 to 3.2 miles per minute) from flight level 0 (takeoff) through flight level 20 (2,000 feet).[2] The local annual average mixing height for LAX is 1,806 feet. Therefore, aircraft vectored over the Palos Verdes Peninsula, located approximately 9 miles south of LAX, would be expected to reach altitudes well above the mixing height by the time they reach the peninsula and emissions would not be expected to mix with ground level emissions or affect ground level concentrations in the area.

Moreover, the proposed Project would not alter the flight paths of departing aircraft. Therefore, it is beyond the scope of the proposed Project for LAWA to coordinate with federal air traffic controllers regarding these flight paths.

[1] U.S. Department of Transportation, Federal Aviation Administration, Guidance on Using the Aviation Environmental Design Tool (AEDT) to Conduct Environmental Modeling for FAA Actions Subject to NEPA, September 12, 2016. Available: https://www.faa.gov/about/office_org/headquarters_offices/apl/environ_policy_guidance/policy/faa_nepa_order/desk_ref/media/guidance_aedt_nepa.pdf.

[2] European Organisation for the Safety of Air Navigation, Aircraft Performance Summary Tables for the Base of Aircraft Data (BADA), Revision 3.0, March 1998. Available: https://www.eurocontrol.int/sites/default/files/library/015_BADA_Aircraft_Performance_Summary_Tables.pdf.

ATMP-AL005-6

Comment: 3. Specific to Section 4.7.1 of the DEIR and only specific to the construction phase of the project, the City is concerned that the proposed improvements to Runway 6L-24R will cause significant aircraft departure delays and disruption FAA departure controllers to rush departures, resulting in congested air traffic between LAX and the Peninsula. We have witnessed that congested air traffic increases the likelihood of vectoring aircraft from the published offshore flight path (OSHNN8) towards the Peninsula because of the FAA's requirement to maintain aircraft separation for safety purposes or because of the pressure placed on air traffic controllers to make up time for departure delays. In addition, given the projected length of the proposed runway construction from 2021 to 2025 and due to the length of runway closures occurring in 4.5-month duration periods, the City is especially concerned that these runway closures may result in disturbing aircraft noise impacts to the community for lengthy periods of time.

Response: The comment states the commenter's opinion that "[d]isrupted and inefficient aircraft movement on the ground has the potential of causing FAA departure controllers to rush departures, resulting in congested air traffic between LAX and the Peninsula" that "increases the likelihood of vectoring aircraft from the published offshore flight path… because of the pressure placed on air traffic controllers to make up time for departure delays." The commenter does not provide supporting evidence.

Moreover, the management of flight operations is outside the scope of the proposed Project. As discussed in Response to Comment ATMP-AL005-1, and in Section 4.7.1.3.1.3 of the Draft EIR, operations at LAX must follow the negotiated operating procedures, unless the FAA determines that weather or airport/air traffic operational conditions require deviation from those procedures. Moreover, the procedures do not abrogate the authority and responsibility of the pilot in command with respect to the safe operation of the aircraft. Thus, the FAA, not LAWA, has the final determination of where aircraft fly. Lastly, the law presumes that LAWA and the FAA will follow required procedures, and the EIR need not speculate on the possibility of future circumstances where the FAA determines that deviation from the LAX Noise Abatement Procedures is necessary.

Further, the comment misstates the construction activities associated with the north airfield improvements. As described in Section 2.4.1 of the Draft EIR, improvements associated with the airfield elements of the proposed Project include: (1) the westerly extension of Taxiway D; and (2) the relocation of the exits from Runway 6L-24R. The construction of the runway exits, which are essentially taxiways that provide aircraft with access to the Central Terminal Area and other parts of the north airfield, are the main improvements requiring the two separate 4.5-month runway closures. Aircraft

activity at LAX between mid-January to late-May is typically the lowest over the course of the year. That 4.5 month period in 2023 and in 2024 is when each of the proposed temporary runway closures is planned to occur.

Notwithstanding the above, the Draft EIR addresses the impacts of temporary changes in aircraft noise, due to reassignment of aircraft operations to other runways at LAX during temporary closure of Runway 6L-24R (in early 2023) and Runway 6R-24L (in early 2024) in Section 4.7.1.5.1.1. Short-term closures of each of the north airfield runways during construction would require aircraft to use three runways at LAX instead of four, resulting in more aircraft using each of the remaining runways. This would not result in more aircraft operations overall. This would cause a temporary, significant aircraft noise impact during each runway closure. Each closure is expected to last approximately 4.5 months in duration. Section 4.7.1.4 describes the methodology for analysis of noise impacts during temporary runway closures.

Regarding noise impacts to the Palos Verdes Peninsula, please see response to comment ATMP-AL005-1.

ATMP-AL005-7

Comment: 4. Section 4.7.1.5.1.1 of the DEIR does not adequately address the foreseen airspace congestion impacts attributed to temporary airfield construction described above nor does the DEIR adequately address or provide mitigation measures for aircraft noise impacts to communities, such as the City of Rancho Palos Verdes, outside of LAWA's Noise Exposure Map. Although the City is not adjacent to LAX, where the Noise Exposure Map illustrates elevated noise disturbances, the City considers itself a noise-sensitive community due to the low ambient noise levels enjoyed by its visitors and residents.

Response: Regarding temporary aircraft-related noise impacts due to construction, please refer to Response to Comment ATMP-AL005-6.

Regarding the City's comment that it considers itself a noise-sensitive community, as stated in Section 4.7.1.4 of the Draft EIR, significant impacts associated with the proposed Project are defined by thresholds of significance established in the L.A. CEQA Thresholds Guide[1] and Appendix G of the State CEQA Guidelines. As discussed in Section I.4 of the L.A. CEQA Thresholds Guide, the City's thresholds are based on noise regulations established by the Caltrans Division of Aeronautics, which, in turn, are based on the FAA's federal aviation regulations. The Draft EIR includes mitigation for aircraft noise that exceeds the thresholds of significance identified in the Draft EIR. For additional discussion of aircraft-related noise impacts to the Palos Verdes Peninsula, please refer to Response to Comment ATMP-AL005-1.

[1] City of Los Angeles, L.A. CEQA Thresholds Guide, Your Resource for Preparing CEQA Analyses in Los Angeles, 2006. Available: https://planning.lacity.org/odocument/cc8fb2f5-dc6c-47f1-bfc3-864b84621abb/CEQAThresholdsGuide.pdf.

ATMP-AL005-8

Comment: 5. In reference to Section 4.8 of the DEIR, the City, along with the SBCCOG, believes that the DEIR does not adequately evaluate impacts to motorists coming from the South Bay. Although CEQA may not require it, LAWA should not use the Vehicle Miles Traveled standard to avoid responsibility for the increased congestion on the critical thoroughfares that will directly result from this large airport expansion. The City encourages LAWA to work with stakeholders such as the SBCCOG, LA Metro, Caltrans, and surrounding cities who have been working together to identify freeway improvements and can do so again to address off site roadway mitigation improvements necessitated by this project. Even though LAWA may have restrictions by the FAA on paying for these off-facility improvements, the impacts to these facilities occur, nonetheless. For example, it may prove beneficial for LAWA to work with other implementing agencies to address the Century Boulevard exit on the northbound 1-405 to allow motorists to head west on Century Boulevard without the need for a traffic signal.

Response: The content of this comment is essentially the same as comment ATMP-AL007-7; please refer to Response to Comment ATMP-AL007-7 and Topical Response TR-ATMP-T-1, which discuss the assessment of transportation effects associated with the LAX Airfield and Terminal Modernization Project that are not subject to CEQA, which was conducted in accordance with the City of Los Angeles Transportation Assessment Guidelines and with State law (SB 743; State CEQA Guidelines Section 15064.3). As indicated therein, traffic congestion is no longer used as a basis for determining significant impacts for land use projects and plans in California.

ATMP-AL005-9

Comment: 6. In reference to Section 4.8.3.2.1 of the DEIR, the City supports LAWA's proposal to eliminate permanent access from Sepulveda Boulevard to Terminal 9. However, we share the same traffic concerns as that of the SBCCOG about opening the new Terminal 9 before the aerial roadway system is complete. We also believe that temporary access from Sepulveda Boulevard is unwise. There will already be access to Terminal 9 via Century Boulevard and the new Jet Way street, which are not dependent on the construction of the aerial roadway and they should alleviate the need for temporary access from Sepulveda Boulevard, particularly given the burden it will cause on the traffic traveling through the tunnel. We urge you to commit to eliminating any access from Sepulveda Boulevard at any time to Terminal 9. Temporary access is costly and unsafe as you have already recognized by eliminating the permanent access from Sepulveda Boulevard. If a third means of access to Terminal 9 is deemed necessary, then we would ask that you delay the opening of Terminal 9 until the aerial roadway system is completed.

Response: Please see Response to Comment ATMP-AL007-8 regarding the temporary nature of the subject interim access and as related to concerns regarding traffic congestion. Please also see Response to Comment ATMP-AL010-127 regarding potential safety concerns.

ATMP-AL005-10

Comment: The City supports the concept of continued evolution and a more efficient, modernized LAX. However, it is difficult to support the ATMP without first addressing some of the current vexing issues, such as FAA improper routing of low flying aircraft, local air space congestion, and environmental sustainability. We must have confidence that LAWA is effectively communicating aircraft noise concerns to the FAA and the two agencies are working together to solve this ongoing issue. The City expects LAWA to champion the concerns of those communities affected by aircraft noise pollution and use their resources to influence the FAA, particularly the FAA's air traffic controllers, to adopt more enforceable, reliable, meaningful and measurable aircraft noise mitigation measures than those described in DEIR.

Response: Please see Response to Comment ATMP-AL005-1 for information regarding community coordination on noise concerns related to flight paths and the role of LAWA and FAA in addressing those concerns. With regards to environmental sustainability, please see Section 2.4.5 of the Draft EIR.

ATMP-AL005-11

Comment: We appreciate your attention to the City's concerns as LAWA finalizes the environmental review. We hope the provided comments, as well as those comments from affected communities, will translate into implementing amicable measures that will mitigate project related impacts to those affected communities, including the City of Rancho Palos Verdes.

Response: The comment is noted and will be included in the Final EIR for consideration by the decision-makers prior to taking any action on the LAX Airfield and Terminal Modernization Project. Responses to the concerns of the City of Rancho Palos Verdes expressed in this letter are provided in Responses to Comments ATMP-AL005-1 through ATMP-AL005-10 above.

ATMP-AL006 Tai, Carrie City of Manhattan Beach 3/15/2021

ATMP-AL006-1

Comment: The City of Manhattan Beach appreciates the opportunity to review Los Angeles World Airport's (LAWA) Draft Environmental Impact Report (DEIR) for the proposed Los Angeles Airport (LAX) Airfield and Terminal Modernization Project (ATMP) and offers the following comments.

1. The ATMP Draft EIR does not properly analyze the actual growth impacts of the modernization program at LAX in inducing increase in aircraft operations that may result in significant environmental impacts. The components of the project that induce and enable the growth of aircraft operations and passenger growth include: airfield

improvements, additional aircraft gates, additional concourse and terminal areas, added roadways. While the ATMP DEIR project description states that the four-runway configuration is the only considerable constraint, the reality is that the current airfield configuration, number of aircraft gates, existing concourse and terminal areas, and the existing LAX roadway network are all constraints to airport growth.

We request that LAWA prepare a revised constrained aviation operations forecast based on realistic, actual, on-the-ground constraints, and re-evaluate whether the improvements envisioned in the ATMP are truly necessary.

Response: LAWA thanks the City of Manhattan Beach for its review of the Draft EIR. As summarized in Section 2.3.1.2.2 of the Draft EIR and further documented in Appendices B.1 and B.2 of the Draft EIR, the Draft EIR appropriately documented the potential of the proposed Project improvements to induce growth in aircraft operations and passengers. All items cited by the commenter (i.e., airfield improvements, additional aircraft gates, etc.) were analyzed and used as input into the airfield simulation analyses documented in Section 3 of Appendix B.2. Please see Response to Comment ATMP-AL010-205 for a discussion regarding differences in operational conditions resulting from the proposed Project improvements based on airfield simulation analyses. As concluded, even though the proposed Project improvements provide an incremental benefit in east flow (in the form of reduced airfield delays), the forecasted aircraft operations and passenger demand (and airline scheduling practices to meet such demand) would not change as a result of the proposed Project improvements, and would therefore not directly or indirectly induce growth at LAX. It should be noted that the constraints analysis presented in Section 4.1 of Appendix B.2 took into consideration the limitations of the terminal component of LAX (i.e., gates and passenger processing facilities) and the landside component of LAX (i.e., surrounding roadways) and determined, as stated on page 4-6, that the airfield component would be the first of the airport system components to constrain the ability of LAX to accommodate the forecasted unconstrained demand at LAX.

The Draft EIR technical analyses were based on substantial evidence, consistent with Section 15384 of the State CEQA Guidelines. Specifically, LAWA's aviation experts have documented facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts in Appendix B of the Draft EIR. Therefore, the constrained demand scenario documented in Appendix B.1 does not need to be revised. Please see Topical Response TR-ATMP-G-1 for further discussion of the validity of LAWA's aviation forecast.

ATMP-AL006-2

Comment: Furthermore, given that projects like LAMP are still ongoing, we request that LAWA commit to updating an aviation operations forecast annually to reflect the actual growth in passenger activity, expressed in millions of annual passengers (MAP), and operations at LAX.

Response: The comment will be included in the Final EIR for consideration by the decision-makers prior to taking any action on the LAX Airfield and Terminal Modernization Project. Please

see Topical Response TR-ATMP-G-1 for more information regarding the aviation demand forecast and future aviation activity at LAX. No further response is required because the comment does not raise any significant environmental issues. (See Public Resources Code Section 21091(d); State CEQA Guidelines Sections 15088(c), 15204(a)).

ATMP-AL006-3

Comment: LAWA should commit to providing additional mitigating measures addressing induced Vehicle Miles Traveled, Air Quality, Noise, and Greenhouse Gas Emissions impacts to surrounding communities within 5 miles.

Response: The Draft EIR evaluated impacts associated with induced vehicle miles traveled (VMT), air quality, noise, and greenhouse gas (GHG) emissions in Sections 4.8, 4.1.1, 4.7, and 4.4 of the Draft EIR, respectively. Where appropriate, impacts to surrounding communities were evaluated. As described in Section 4.8.5.4.2 of the Draft EIR, there are no feasible mitigation measures to directly address the induced VMT impact. However, any excess VMT reduction associated with employee VMT reduction strategies could be credited to the mitigation of the induced VMT impact. Mitigation measures for criteria pollutant emissions are identified in Sections 4.1.1.5.1.2 and 4.1.1.5.2.2 of the Draft EIR; mitigation measures for noise impacts are identified in Sections 4.7.1.5.1.3 and 4.7.3.5.2.2 of the Draft EIR; and mitigation measures for GHG emissions are identified in Section 4.4.5.1.4 of the Draft EIR.

ATMP-AL006-4

Comment: 2. The use of term "modernization" in the project title is misleading. The project title is the first indicator to the public about what a project entails. The use of a deliberately misleading term masks the true nature of the airport's intended growth, which is contrary to the LAX ATMP DEIR's indication (Section 6.3.2) that passenger activity levels will increase, with or without the project.

The LAX Master Plan "provides for the modernization of the runway and taxiway system, redevelopment of the terminal area, improvement of access to the airport, and enhancement of passenger safety, security, and convenience." (www.lawa.org: accessed March 11, 2021) Every LAX project since 2004 LAX Master Plan was adopted has been labeled as a modernization, but significant amounts of building space and amenities, referenced in Comment #4, have been added.

In the Land Access Modernization Program (LAMP), the term "modernization" is used to refer to the Automated People Mover (an entirely new transportation system), the lntermodel Transfer Facilities (ITFs) that result in the additional capacity for potentially over 30,000 vehicles (ITF East - 8,300 parking spaces; ITF West - 8,000 parking spaces), and ConRAC - 8,000 rental car capacity plus 10,000 overflow spaces), enabling and even encouraging the increase in the use of automobiles to travel to and from Los Angeles International Airport. The construction of these facilities will exacerbate the use of

vehicles near LAX, contributing to the region's vehicle-related air quality impacts and traffic impacts.

Section 2.3.1 of the ATMP states "Over the past several decades, LAWA has continued to provide modernization-related improvements at LAX that improve the safety and operational management of the airport, improve passenger quality-of-service, and serve to accommodate future growth." As part of the ATMP project, the term "modernization" is being used to describe Concourse O (with 9 new gates, up to 1,275,600 square feet), Terminal 9 (1,413,600 square feet, 12-18 new aircraft gates; 700,000 square-foot parking facility), miles of new roadways, a mile-long taxiway extension for the largest Aircraft Design Group category (ADG VI), among many other project components. The concept of modernization has resulted in tremendous growth at LAX and the DEIR should not assert that the growth would happen without these projects.

Response: Forecasting and technical analyses documented in Appendix B.1 of the Draft EIR properly concluded that forecasted increases in aircraft operations and passengers would occur with or without the proposed Project. The forecast results presented in Section 3.4 of Appendix B.1 would have been the same regardless of the proposed Project airfield or terminal improvements, because they were the results of an independent regression analysis focused on evaluating the relationship between aviation demand (dependent variables, such as enplanements) and economic measures (independent variables, such as population and income). Please see Topical Response TR-ATMP-G-1 for further information regarding background in aviation activity forecasting supporting the analyses documented in Appendix B.1 of the Draft EIR. Therefore, contrary to the commenter’s assertion, the proposed Project improvements would not result in growth at LAX.

LAX projects (such as the LAX Landside Access Modernization Program) discussed by the commenter were the subject of environmental documentation prepared according to CEQA requirements and guidelines. The potential of each project to induce growth has, therefore, been analyzed, and potential environmental impacts properly documented.

ATMP-AL006-5

Comment: 3. While LAWA insists that the forecasted growth in air travel will occur regardless of the project, the City finds evidence that LAWA's modernization projects provide a catalyst to accelerate the growth rate of prior forecasts. In comparing the constrained and unconstrained forecasts from the aviation forecasts dated 2012 and 2021, the passenger volume of the unconstrained forecasts actually has become achievable due to airport projects improving factors that previously restrained growth. This, pattern, undertaken over decades, provides a 'chicken and egg" pattern whereby airport projects are undertaken due to "forecasted growth", however those projects themselves accelerate that growth to affect the next growth forecast.

Table 1 compares LAX Specific Plan Amendment Study (SPAS) Report Forecast with actual activity at LAX, expressed in Millions of Annual Passengers (MAP):

Table 1 – Actual Versus Forecasted Activity

Year	Actual Annual Activity (MAP)	2012 LAX SPAS Forecast (MAP)
2009	56.5	56.5
2010	59	57.4
2011	62	58.9
2012	59	60.3
2013	66.67	61.8
2014	70.67	63.3
2015	74.94	64.8
2016	80.92	66.5
2017	84.55	68.1
2018	87.53	69.8
2019	88.07	71.5
2020*	28.78	73.1

Source: LAWA *COVID-19 Emergency

During this time, LAWA undertook the following "modernization" projects, among others:

- Modernization of Terminal 2/3 (addition of 830,000 square feet);
- Midfield Satellite Concourse North (700,000 square feet; 11 new passenger gates, supplemental control tower)
- Midfield Satellite Concourse South (150,000 square feet; 8 new gates)
- Terminal 1.5 Construction (417,000 square feet)
- Terminal 6 Renovation (added over 85,000 square feet)
- Tom Bradley International Terminal improvements/ Bradley West (Add 1.2 million square feet; 9 new gates)
- Terminal 7 Renovation Project
- Airfield improvements, taxiway projects
- LAX-it - Rideshare lot
- Approval of Land Access Modernization Program, which adds two lntermodal Transfer Facilities, a car rental consolidation facility, and a people mover

The City requests that LAWA provide an analysis to determine what forecasted growth would have been absent these improvements.

Response: Contrary to the commenter's assertion, recent improvement projects at LAX did not provide a "catalyst to accelerate the growth rate" in passenger growth. As described in detail in Topical Response TR-ATMP-G-1, there is no evidence of a significant correlation at LAX between improved airport facilities and increased passenger activity levels.

The commenter cites an analysis that the commenter conducted purporting to compare the "constrained and unconstrained forecasts from the aviation forecasts dated 2012 and 2021." In fact, the table (see Table 1 in Comment ATMP-AL006-5) compares the actual annual activity at LAX between 2009 to 2020 against the results of a passenger forecast prepared for the LAX Specific Plan Amendment Study in 2012. As documented by the commenter, passenger growth at LAX surpassed the 2012 forecast projections

until the COVID-19 pandemic in 2020, which resulted in a dramatic decrease in passenger activity levels.

There is no evidence, however, that passenger growth at LAX over the last 10 years is related to the improvements the commenter lists, and the commenter is incorrect that the projects addressed factors that previously restrained growth. Contrary to the commenter's assertion, most projects included in this list have not been completed and could, therefore, not have induced passenger growth between 2009 and 2020, as summarized below.

Project	Status
Terminals 2 and 3 Modernization Project	Not completed. Terminal 3 is currently under construction, while construction on Terminal 2 has not started other than at its interface with Terminal 3.
Midfield Satellite Concourse North	Opened in May 2021
Midfield Satellite Concourse South	Initiated design
Terminal 1.5 Project	Opened in June 2021
Terminal 6 Renovation Project	Construction recently initiated
Bradley West	Completed in 2013
Terminal 7 Project	Completed in 2018
Airfield improvements, taxiway projects	Ongoing
LAXit	Not a modernization project. LAXit is a temporary facility to help reduce traffic in the Central Terminal Area while LAX Landside Access Modernization Program improvements are being constructed.
Landside Access Modernization Program	Ongoing

As discussed in TR-ATMP-G-1, many factors influence passenger demand, and the way airlines respond to such passenger demand in developing flight schedules. The projects identified by the commenter and discussed above, individually or together, will not affect the capacity of the airfield system component, which has been documented to be the constraining component in the LAX Airfield and Terminal Modernization Project Draft EIR, as further explained in Appendix B of the Draft EIR.

ATMP-AL006-6

Comment: 4. The LAX Specific Plan Amendment Study Report from July 2012 included an Activity Forecast for Year 2025 showing 78.9 Million Annual Passengers (MAP) (referenced in Appendix F (Page 12)). The Activity Forecast Report in Appendix B of the LAWA ATMP DEIR, upon which the aviation activity for the DEIR is based, forecasts the Year 2025 Annual MAP as 102.9, an increase of 30%. While it is clear that actual annual activity has surpassed the forecast as prepared in 2012, the Aviation Operations Forecast included in Appendix B capitalizes upon the actual activity (likely made possible by significant LAX improvements over the past decade). The ATMP DEIR then uses this as justification that the ATMP is needed to accommodate forecasted growth. We request that LAWA prepare a constrained aviation operations forecast based on realistic, actual, on-the-

ground constraints, and re-evaluate whether the improvements envisioned in the ATMP are truly necessary.

Response: Portions of this comment are similar to the commenter's previous comment. Please see Response to Comment ATMP-AL006-5 for a discussion of how passenger growth at LAX has surpassed the 2012 forecast projections. In addition, as discussed in Response to Comment ATMP-AL006-5, the majority of the projects listed by the commenter have not been completed between 2009 and 2020, and could, therefore, not have contributed to inducing passenger growth as asserted by the commenter.

Contrary to the commenter's assertion, the Draft EIR forecasts were prepared based on realistic and on-the-ground constraints, consistent with FAA guidance and industry standards, as documented in Appendix B.1 of the Draft EIR. See Topical Response TR-ATMP-G-1 for a discussion of background information in aviation forecasting. Therefore, there is no need to prepare a new forecast or re-evaluate the need for the proposed Project improvements.

ATMP-AL006-7

Comment: 5. The project description does not include sufficient detail. Sections 2.4.2.l and Section 2.4.2.2 of the Project Description states that the specific building sizes have not been identified and that an assumption of an additional 20% has been made to building areas for the purposes of environmental clearance. The purpose of CEQA is not to allow lead agencies to circumvent the public's ability to review the actual nature of the project by putting forth an imprecise project description for purposes of CEQA clearance, only to later change the actual project. Section 15146 of the State CEQA Guidelines indicates that construction projects should have more specific details because its effects can be predicted with greater accuracy. To present a construction project with a conservative added 20% of square footage does not provide sufficient detail of what is being proposed. We request that LAWA provide very specific criteria that would require a subsequent CEQA action per Government Code Section 15162 to evaluate changes should building shapes change in a way that affect other airport components. Specifically, if there are any roadway configuration changes, reduction in travel lane capacity, reduction in parking spaces, changes to the configuration of proposed concourse and terminal areas, and reconfiguration of any airfield spaces that either increase the number of aircraft (by decreasing each aircraft gate size) or decrease in the number of aircraft (by increasing each aircraft gate size), LAWA should document and analyze the changes and provide notification to all parties concerned with the ATMP project.

Response: Section 2.4.2 of the Draft EIR provides a complete description of the key components of Concourse 0 and Terminal 9. As indicated therein, the 20 percent contingency was included to account for the possibility that design refinements may lead to additional building floor area, and also served to provide a conservative impacts analysis that includes such additional area. Although the final design has not been determined, the preliminary design presented in the Draft EIR provides sufficient information to determine the maximum size of the total building area, and to provide information on

the massing, scale, appearance, and proposed uses of the building. The information is sufficient to identify the environmental effects of the proposed Project.

The 20 percent contingency is appropriate. Preparing final design and construction plans is both expensive and time consuming. It would be wasteful, and therefore inappropriate, to prepare such plans at this stage. That is because, at this point in the process, LAWA must make a policy decision whether to proceed with the proposed Project. If LAWA does not approve the Project, or approves an alternative to the Project, the money and time devoted to preparing final detailed development plans will have been wasted. In addition, the environmental review process contemplates that a project may evolve as impacts are analyzed and disclosed, and mitigation measures are identified. Because the CEQA process contemplates that a project may evolve in this manner, it would be wasteful to prepare final detailed development plans at this stage of the process. The 20 percent contingency ensures that LAWA has identified and analyzed the conservative "worst case," in terms of potential environmental effects. This approach could result in "over-mitigation," in that the mitigation measures adopted by LAWA will be fashioned to address a project that is larger than what LAWA actually builds. The 20 percent contingency is designed, therefore, to strike a reasonable balance between providing LAWA with a small degree of flexibility, while provide sufficient information to understand and disclose the Project's potential environmental effects.

CEQA provides that the description of a project in an EIR must contain sufficient detail to identify and analyze the project's environmental effects. Extensive detail, beyond that which is required to perform this analysis, is not required. As explained above, providing greater details, at a construction design and development level of detail, would be extremely costly, and these costs would be wasted if the project is not approved or evolves as a result of the environmental review process. Case law recognizes that such flexibility is permissible.

Under the State CEQA Guidelines, four items of information must be included in the project description: (1) a detailed map with the precise location and boundaries of the proposed project, (2) a statement of project objectives, (3) a general description of the project's technical, economic, and environmental characteristics, and (4) a statement briefly describing the intended uses of the EIR and listing the agencies involved with and the approvals required for implementation. (State CEQA Guidelines, Section 15124.) Aside from these four items, the State CEQA Guidelines provide that the project description should not "supply extensive detail beyond that needed for evaluation and review of the [project's] environmental impact." (State CEQA Guidelines, Section 15124; see *California Oak Foundation v. Regents of University of California* (2010) 188 Cal.App.4th 227, 269-270.) In this case, the description of the proposed Project description contains this information, and is sufficient for purposes of analyzing the proposed Project's impacts. Including a measure of flexibility into the description of the proposed Project is permissible. (*South of Market Community Action Network v. City and County of San Francisco* (2019) 33 Cal.App.5th 321, 332 (South of Market); *East Sacramento Partnerships for a Livable City v. City of Sacramento* (2016) 5 Cal.App.5th 281, 292 [addition of eight housing units is the type of change expected during the CEQA process and did not render project description defective]; *Citizens for a Sustainable Treasure Island v. City and County of San Francisco* (2014) 227 Cal.App.4th 1036, 1055

(Treasure Island) [project description adequate where the basic characteristics of the project "remained accurate, stable, and finite throughout the EIR process"].)

The commenter asks LAWA to identify the specific criteria that will be used to perform supplemental review under Public Resources Code Section 21166, in the event LAWA approves the proposed Project, and the Project thereafter changes. LAWA will perform supplemental review if, following Project approval, some aspect of the Project changes in a way that involves the exercise of discretion, and the change has the potential to result in new or substantially more severe environmental effects that have not previously been identified. In the event that such changes are proposed in the Project that will require supplementing the current EIR, additional environmental analysis will be completed in accordance with the requirements of Public Resources Code Section 21166 and State CEQA Guidelines Sections 15162, 15163, and 15164.

ATMP-AL006-8

Comment: 6. The addition of Concourse O and Terminal 9 results in a net increase of 3-12 additional passenger aircraft gates. There is no discussion about the future management of the new gates at Concourse O and Terminal 9. The evaluation of new gates should include the total number of passengers that can be accommodated given the new gates. Section 2.4.2.3 indicates that Terminal 9 is anticipated to be used primarily by widebody aircraft. Has an analysis been performed to determine whether this could potentially increase the number passengers?

Response: As documented in Table 2-2 of Appendix B.2 of the Draft EIR, the primary operator at Concourse 0 is expected to be Southwest Airlines, while Terminal 9 would potentially accommodate United Airlines and its STAR Alliance partners. It is, therefore, assumed that Concourse 0 would be managed similarly to the existing Terminal 1, while Terminal 9 would be managed similarly to existing Terminal 7. Additionally, the gate layouts for 2018, 2028 No Project, and 2028 With Project (i.e., proposed Project) include a wide range of gates, with various Airplane Design Group (ADG) capabilities, with contact gates or remote gates, and with various gate dependencies (i.e., when the usage of a gate depends on the size of the aircraft parked at an adjacent gate). As documented in Section 4.4.1 of Appendix B.1 of the Draft EIR, more than 60 commercial passenger airlines operated at LAX in the baseline year of 2018. Each airline operates their gates differently, with different air service characteristics and utilization. In addition, LAX gates are operated under various types of lease agreements (for exclusive-use, preferential-use, or common-use gate operations), all of which can influence the number of passengers that can be accommodated at a particular gate. As discussed in Sections 3 and 4 of Appendix B.1 of the Draft EIR, the forecast number of passengers are the result of a regression analysis and a constrained demand scenario development process.

Please see Section 3.6 of Appendix B.2 of the Draft EIR for a discussion of the airfield simulation analyses conducted to assess potential changes in aircraft operation and passenger demand as a result of the proposed Project improvements. Additional information regarding the forecast constrained demand scenario can be found in Section 4 of Appendix B.1 of the Draft EIR.

ATMP-AL006-9

Comment: 7. The topic of the West Remote Gates is frequently mentioned throughout the ATMP DEIR, since removal of some of the West Remote Gates offsets the additional gates in Concourse 0 and Terminal 9. The removal of the West Remote Gates has been a frequent topic of past projects, including the Midfield Satellite Concourse project. As a reminder, the Tom Bradley International Terminal (TBIT}/Bradley West Project cited the reduction in the use of the West Remote Gates as a justification. Then, in 2014, the LAX Midfield Satellite Concourse Draft EIR also indicated that the project would reduce reliance on the West Remote Gates and reduce the need to bus passengers to the terminal. This is the same justification used for the construction of Concourse 0 and Terminal 9 (Page 2-10 of the ATMP DEIR}. However, Section 2.4.2.3 of the ATMP DEIR states that eighteen gates remain. What reassurances does the public have the remaining West Remote Gates will not continue to be used to serve additional aircraft, be it passenger or cargo, thereby increasing aircraft operations for passengers or cargo?

Response: As documented in Section 2.4.2.3 of the Draft EIR, 15 out of 18 West Remote Gates would be decommissioned upon the implementation of the proposed Project and would no longer be used for regularly-scheduled commercial flights. Please see Topical Response TR-ATMP-G-2 for further discussion regarding the West Remote Gates and intended decommissioning and future use.

ATMP-AL006-10

Comment: 8. The project description states that a Federal Inspection Services (FIS) facility will be added to Terminal 9 to supplement the existing FIS facility at TBIT, where international passengers arriving into the West Remote Gates are processed. Because some of the West Remote Gates will be decommissioned as part of ATMP, the stated intention of the FIS facility is to process those passengers formerly arriving at the West Remote Gates but now arriving into Terminal 9. This represents an expansion to the FIS processing capabilities at LAX. The City requests that LAWA evaluate the potential for the proposed FIS at Terminal 9 to induce growth beyond the forecasted amount.

Response: As documented in Section 2.3.1.1.2 of the Draft EIR, eliminating WRGs would eliminate the inconvenience and inefficiency of busing passengers to and from the WRGs. Terminal 9 would provide direct access to FIS processing facilities, enhanced customer service, as well as greater connectivity to other terminals at LAX. However, there is no evidence to suggest that including FIS facilities directly within Terminal 9 would expand FIS processing capabilities or induce passenger growth beyond the forecasted amount. As documented in Section 1 of Appendix B.1 of the Draft EIR, passenger demand was forecasted independently from any existing or future limitations (e.g., physical, operational, or regulatory). Passenger demand was forecasted based on projected economic activity and socioeconomic factors, as documented in Section 2.2 of Appendix B.1 of the Draft EIR. Please also see Topical Response TR-ATMP-G-1 for a discussion of factors influencing passenger demand.

ATMP-AL006-11

Comment: 9. The DEIR does not explain the significance of identifying portions of the project as "enabling projects". CEQA requires that all actions that are part of a whole be analyzed as part of the project. Therefore, the DEIR must clarify whether "enabling projects" were analyzed with the same level of detail in the DEIR, specifically with regard to impacts to vehicle miles travelled (construction and hauling trips to remove debris}, air quality (dust from demolition activities and hauling activities), public services (impacts on landfill capacity; induced vehicle miles from hauling to landfills that accept the types of debris needing disposal}. Please confirm that impacts from the construction of all enabling projects was analyzed at the same level of detail as the main ATMP project components.

Response: The proposed Project consists of a number of defined elements, including airfield improvements, terminal improvements, and landside improvements. In addition to these elements, existing uses located in or near the proposed improvement sites would need to be removed and/or relocated to accommodate the proposed improvements. As explained in Section 2.5.1 of the Draft EIR, these related actions are referred to as “enabling projects.” In accordance with CEQA, the environmental analysis must consider both direct and indirect physical changes in the environment. Implementation of enabling projects has the potential to result in indirect physical changes that must be considered in an EIR. The purpose of identifying enabling projects in the Draft EIR is to ensure that any indirect effects from the implementation of enabling projects are considered in the environmental analysis. Physical changes to the environment that would result from implementation of the enabling projects are considered in the Draft EIR to the extent that they can be determined at this time. For example, demolition of existing structures and infrastructure is accounted for in the analysis of construction-related air quality, greenhouse gas, and human health impacts, including both impacts from demolition activities and impacts from construction and haul trips to remove the demolished material. These impacts were evaluated in the Draft EIR at the same level of detail as the main Project elements. However, in some cases, the disposition of an enabling project may not be fully known at this time. For example, the Draft EIR identifies the relocation of the Southwest Airlines ground support equipment (GSE) facility as an enabling project. However, the specific location of the relocated facility has not been determined. Rather, the EIR identifies several alternative locations for this facility. Therefore, the impacts of relocating the Southwest Airlines GSE facility to a specific location are not addressed in the Draft EIR.

ATMP-AL006-12

Comment: 10. The Taxiway D "extension" is a substantial addition to the north airfield. The proposed new taxiway in the western portion of the north airfield is conveniently labeled as an extension, but is actually an entirely new mile-long taxiway. The creation of this new taxiway facilitates movement of aircraft off of Runways 6L-24R, enabling closer spacing of landing aircraft. Page 2-16 of the Project Description specifies that LAX is anticipated to be constrained by its four-runway airfield system. While LAWA is not proposing to extend runways, the construction of new taxiways directly increases the

capacity of runways, thereby relaxing an identified constraint to airport forecasts. Page 3-7 of the Operational Analyses Report describes the Taxiway D extension as providing "operational flexibility to allow ATC [Air Traffic Control] to avoid routing aircraft on taxiways that restrict Runway 6R-24L departures" and "the exit taxiways eliminate the need for increased arrival spacing during east flow operation conditions (which currently occurs under existing conditions)." Increased aircraft routing space and decreased landing separations represent relaxation of constraints that have the potential to induce growth.

Response: As discussed on page 2-9 in Section 2.3 and depicted on Figure 2-4 of the Draft EIR, the existing taxiway system in the north airfield includes two taxiways that run parallel to Runway 6R-24L. Taxiway E extends the entire length of the runway while Taxiway D only extends along the eastern two-thirds of Runway 6R-24L. The airfield improvements proposed as part of the LAX Airfield and Terminal Modernization Project include extending this existing Taxiway D to the western end of Runway 6R-24L; the proposed taxiway improvement is not “an entirely new mile-long taxiway” as claimed by the commenter. Rather, the proposed taxiway improvement is estimated to be a roughly 0.28 mile extension of an existing taxiway.

Contrary to the commenter’s assertion, the westward extension of Taxiway D would not enable closer spacing for landing aircraft in either west flow or east flow. As noted by the commenter and stated on page 3-7 in Appendix B.2 of the Draft EIR, “[t]he additional Runway 6L exit taxiways eliminate the need for increased arrival spacing during east flow operating conditions (which currently occurs under existing conditions).” Operational changes associated with the proposed Project improvements were simulated and documented in Appendix B.2 of the Draft EIR. Please see Response to Comment ATMP-AL010-205 for a discussion of the relationship between the proposed Project airfield improvements and induced growth. As explained there, even though the proposed Project improvements would provide an incremental benefit in east flow (in the form of reduced airfield delays), the forecasted aircraft operations and passenger demand (and airline scheduling practices to meet such demand) in 2028 would not change as a result of the proposed Project improvements. As a result, the assumptions and results of the constrained demand scenario documented in the Draft EIR are valid and provide substantial evidence in the record that the proposed Project improvements would not directly or indirectly induce growth at LAX.

ATMP-AL006-13

Comment: 11. LAX's geographical placement on the west coast of the United States makes it one of the primary gateways to the Pacific Rim. International flights use primarily ADG V and VI aircraft, due to the aircraft range needed to travel distances between the western United States and Asia or Australia. (Flights to South Pacific areas may use ADG IV, but those flights are not as frequent as those to Asia or Australia simply due to geographical size and population). ADG V and VI aircraft. in addition to having the widest wingspan, have the highest volume passenger capacity. Section 4.4.4 of the Aviation Forecasts Report states that during times of constrained airport operations, airlines will upgauge aircraft. The upgauging of aircraft logistically may mitigate an airline's challenges at a constrained

airport, but also has the potential to increase passenger count due to the airlines efforts to fill all passenger seats on a flight. Airlines may turn to deeply discounted tickets or other measures to fill these seats, potentially increasing the passenger counts beyond the forecasted amounts.

The project description states that Taxiway D "Extension" is designed to accommodate ADG VI aircraft. This will accommodate the largest size passenger aircraft, such as Boeing 777s and Airbus A380s, which have the highest passenger capacity. The facilitation of larger aircraft increases the number of passengers potentially transiting through LAX, inducing growth and straining public services and infrastructure in the surrounding communities and the region. LAWA must evaluate this inducement of growth in a revised forecast instead of assuming that project simply accommodates projected growth.

Response: As explained in Section 2.3.1.2.2 of the Draft EIR, the annual activity forecast and regression analysis prepared by LAWA's aviation experts determined that aircraft operations would be the same in 2028 with or without the proposed Project, and that the proposed Project would not result in increased aviation and/or passenger activity levels or capacity at LAX. This analysis is supported by substantial evidence as documented in Appendix B.1 of the Draft EIR. Please see Topical Response TR-ATMP-G-1 for further discussion of the validity of this forecast.

The relationship, discussed by the commenter, between larger aircraft and additional seats in a constrained airport environment is documented in Section 4.4.1 of Appendix B.1 of the Draft EIR. The associated anticipated increase in load factors (i.e., the percentage of seats occupied by passengers on a flight) was also already assumed in the forecast analyses, as documented in Table 3-6 of Appendix B.1.

Please see Section 4.4 of Appendix B.1 for a discussion of anticipated operational changes under a constrained airfield environment, which may include, as noted by the commenter, changes in airfares (either increases or decreases in airfares). However, as further noted in Section 4.4.4 of Appendix B.1, it would be speculative to attempt to predict which sets of actions each of the 65+ commercial passenger airlines would implement over time. Therefore, the assumptions documented in Appendix B.1 are reasonable assumptions for LAX as a whole.

As discussed in Section 2.3.1.1.1 of the Draft EIR, the westerly extension of Taxiway D would be designed to Airplane Design Group (ADG) VI aircraft to facilitate taxiing operations on the north airfield and improve operational efficiency. It is important to note that the two aircraft types cited by the commenter (Boeing 777 (ADG V) and Airbus A380 aircraft (ADG VI)) already operate on the north airfield today. The proposed Project improvements would therefore not create a new airfield condition that does not exist already under existing conditions. Therefore, the proposed Project would not induce growth beyond that which could be accommodated under existing conditions.

ATMP-AL006-14

Comment: 12. The traffic congestion in the Sepulveda tunnel currently creates a toxic air quality condition for humans inside the tunnel. Keeping in mind that not all passenger vehicles have a functioning climate control system that enables closed windows the entire time, and the length of time motorists spend in the tunnel, such exposure can be harmful to human respiratory systems. The DEIR does not describe how the proposed project does not exacerbate this condition. This is not addressed in the air quality section, nor is it addressed in the Health Risk Assessment.

Response: The commenter provides no information or other evidence in support of the assertion that "[t]he traffic congestion in the Sepulveda tunnel currently creates a toxic air quality condition for humans inside the tunnel." As noted in Appendix G.2 of the Draft EIR, the portion of Sepulveda Boulevard that includes the tunnel is under the jurisdiction of Caltrans. Design and operation of the tunnel ventilation by Caltrans is required to meet the guidelines of the South Coast Air Quality Management District (SCAQMD) for the proper operation of equipment, including scrubbers for tunnel ventilation systems. Ventilation system ducts can be seen from within the tunnel, and the large ventilation building that houses the blower/scrubber equipment can be seen at the northwest corner of the tunnel and is clearly identified as "Ventilation Building."

Notwithstanding the above, the proposed Project does not change the configuration of the existing Sepulveda tunnel. However, exit and entrance ramps north of the tunnel would be modified by the proposed Project. The proposed roadway improvements are designed to relieve some of the congestion in the tunnel, thereby improving northbound traffic flows through the tunnel. Estimated traffic counts for the Sepulveda tunnel were included in the air quality modeling for the proposed Project and are provided in Appendix C.2 of the Draft EIR. In the air quality model, the Sepulveda tunnel is identified as traffic link 101395; traffic volumes for this location can be found in the "2018 Baseline Study Area Traffic Link Volume Summary" and the "2028 With Project Study Area Traffic Link Volume Summary" in Appendix C.2 of the Draft EIR. The traffic volumes for the "AM", "PM", "MD", and "NT" periods[1] are summed in the following table:

Daily Traffic Volume (values are rounded)					
Scenario	**Total**	**AM**	**MD**	**PM**	**NT**
2018 Baseline	73,721	9,155	22,102	12,188	30,274
2028 With Project	70,081	9,992	21,520	12,105	26,462

This summary shows that, with implementation of the proposed Project, overall traffic congestion in the tunnel would be reduced compared to 2018 baseline conditions. Specifically, decreases in traffic would occur in the mid-day, afternoon, and night-time periods. These decreases would offset the slight increase in traffic in the tunnel during the morning when calculating daily traffic volumes.

Please see Response to Comment ATMP-PC028-4 regarding potential human health impacts from air quality.

[1] The period hours are defined as AM = 3 hours (6 am to 9 am); MD = 6 hours (9 am to 3 pm); PM = 4 hours (3 pm to 7 pm) and NT = 11 hours (7 pm to 6 am).

ATMP-AL006-15

Comment: 13. Provide clarification of project schedules. The ATMP project is dependent on improvements that are currently part of the Land Access Modernization Program, which is currently under construction. However, certain ATMP improvements are slated to begin prior to LAMP being completed in 2023. Furthermore, while the project description provides a project schedule on Figure 2-8, the schedule is in very broad time periods and does not correspond to the identified project elements that comprise the ATMP. Therefore, the City requests that the Draft EIR Project Description be revised to include a more detailed project schedule and that corresponding environmental analysis sections be crosschecked and revised to ensure that impacts are evaluated based on the realistic scenario of on-the-ground conditions.

LAWA has previously stated that project schedules are conceptual and are refined later in project phases. This is generally the case in large and complex capital construction projects like ATMP. However, LAWA's intent to complete the ATMP by 2028, as stated in one of the EIR objectives, means that LAWA has had to develop a more detailed schedule to ensure that this politically-mandated timeline is met. Furthermore, with LAMP undergoing active construction and slated to continue until 2023, the ATMP's stated start time of mid-2021 has to coordinate with the LAMP construction schedule. State CEOA Guidelines Section 15146 indicates that the degree of specificity for a construction project should be more detailed than that of a planning study. Based on the ATMP's many project components, the absence of a detailed project schedule does not allow for proper review or analysis of true impacts. Therefore, the City requests that LAWA include project scheduling for each ATMP project component and correspond these components with the LAMP construction schedule within the ATMP DEIR to meet CEOA intent of full disclosure and providing information in adequate detail for public review.

Response: While operation of Concourse 0 and Terminal 9 is noted in Section 2.4.2 of the Draft EIR as including connections to the Automated People Mover (APM) system, currently under construction as part of the LAX Landside Access Modernization Program, neither Concourse 0 nor Terminal 9 is dependent on the APM. Moreover, neither Concourse 0 nor Terminal 9 would be operational before completion of the APM system.

Relative to construction phasing, Figure 2-8 in the Draft EIR, as updated in this Final EIR (see Chapter F3, Corrections and Clarifications to the Draft EIR), the general timeframes of each of the key elements that comprise the Airfield and Terminal Modernization Project, including airside improvements, Concourse 0, Terminal 9, and landside improvements, are shown. Additional information is provided in the text of Section 2.6.1 of the EIR. The construction phasing information available at the time the Draft EIR was prepared was sufficient for estimating project impacts over the course of construction leading up to Project completion in 2028, including annual construction-related air

pollutant and GHG emissions as presented in Sections 4.1 and 4.4, respectively, of the Draft EIR.

With regard to the timing and interface of construction activities associated with the proposed LAX Airfield and Terminal Modernization Project and construction activities associated with the approved LAX Landside Access Modernization Program, the most immediate construction associated with the proposed LAX Airfield and Terminal Modernization Project would be that of the airfield improvements (see Figure 2-8), which has no relationship to ongoing construction of the LAX Landside Access Modernization Program. Construction of Concourse 0, including enabling projects, is anticipated to begin around early-2022. As indicated in Section 2.5.1 of the Draft EIR, the enabling projects for Concourse 0 include removal of existing facilities at northern end of the site (see Figure 2-26b of the Draft EIR) and removal of the facilities associated with the "LAX-it" transportation network companies (i.e., Uber/Lyft) pick-up lot. Table 2-4 of the Draft EIR indicates that the LAX-it pick-up lot is assumed to remain in service until the APM opens in 2023; demolition of the facilities in the northern portion of the site could still proceed. Additionally, operations in the LAX-it pick-up lot could be consolidated into the western portion of the site, which would allow for its continued operation while development of the eastern portion of the site for Concourse 0 proceeds (i.e., start soil excavation to raise the elevation of the site). With regard to Terminal 9, enabling projects activities are anticipated to start around mid-2022. The only related aspect of the construction activities associated with the LAX Landside Access Modernization Program would be completion of the APM segment located near to, but outside of, the northern edge of the Terminal 9 site. Even if construction of that APM segment was still underway in mid-2022, that would not preclude or constrain the ability to proceed with enabling projects elsewhere throughout the Terminal 9 site. With regard to the landside (roadway) improvements associated with the proposed LAX Airfield and Terminal Modernization Project, the only aspect of the proposed Project that relates to LAX Landside Access Modernization Program would be the access to Terminal 9 from the future intersection of Jetway Boulevard and Century Boulevard. Such access would not be needed until Terminal 9 is ready to start operations, at which completion of the extension of Jetway Boulevard down to Century Boulevard would occur several years prior to the operation of Terminal 9.

In summary, the development phasing information provided in the EIR is sufficient for determining and disclosing the potential impacts of the LAX Airfield and Terminal Modernization Project, in accordance with CEQA requirements.

ATMP-AL006-16

Comment: 14. According to the Project Description in the DEIR, construction of Terminal 9 would be completed by late 2027; whereas, construction of the roadway system improvements providing access to Terminal 9 would not be completed until 2028. In the interim, temporary roadway improvements are proposed to provide access to Terminal 9. Consequently, said proposal results in construction-related roadway/traffic impacts to heavily-traveled Sepulveda Boulevard, once during construction of temporary ramps for the interim roadway proposal, and yet again during construction of the permanent

roadway improvements as proposed by the project. The project should not bifurcate an operational building (Terminal 9) from the permanent road that serves that building.

Given the bifurcated proposal, the analysis of alternatives in the DEIR is deficient. The DEIR does not evaluate an alternative where no interim roadway access to Terminal 9 is constructed; rather, operation of Terminal 9 commences at a time where the associated, permanent, roadway improvements are completed. Elimination of construction of the interim roadway access to Terminal 9 would minimize the number of days the public is subjected to construction-related roadway/traffic impacts. Elimination of interim roadway construction further minimizes construction and construction traffic-related Air Quality, Greenhouse Gas, and Noise impacts. The City requests that this alternative be considered and believes that said alternative is environmentally superior in comparison to the proposed project.

Response: Section 2.6.5.2 of the Draft EIR describes the temporary access roads to Terminal 9 that are referenced in the comment, and Figure 2-30 of the Draft EIR depicts their location. It is recognized that Sepulveda Boulevard is a main thoroughfare and that construction-related disruption of traffic flows on Sepulveda Boulevard should be minimized or avoided. In conjunction with development of detailed construction plans for the temporary access roads to Terminal 9 and the permanent replacement ramp from northbound Sepulveda Boulevard to eastbound Century Boulevard, a plan(s) addressing how traffic flows in the local area are to be maintained during construction would be developed and would be submitted to Caltrans for review and approval. Further, it is important to note that providing temporary roads to Terminal 9 is a construction implementation option, if needed to provide interim access while the permanent roadway improvements are being completed. The Draft EIR provides a conservative impacts analysis by including construction of the temporary access roads. Section 2.6.5.2 of the Draft EIR has been revised to clarify that development of the temporary access roads to Terminal 9 is a construction implementation option – please see Chapter F3, Corrections and Clarifications to the Draft EIR, for that clarification.

Additionally, temporary disruption of traffic during construction, as related to traffic congestion and delay, is not a CEQA issue, as explained in Section 4.8.1 of the Draft EIR (i.e., the focus on transportation impacts under CEQA is now on vehicle miles traveled). As such, an alternative where interim access to Terminal 9 is not constructed would not affect the Draft EIR's analysis of, and significance conclusions for, the transportation impacts of the proposed Project.

This alternative would, however, reduce construction-related air quality, greenhouse gas (GHG) emissions, and noise impacts. It should be noted that such reductions would not change the significance conclusions in the Draft EIR regarding such impacts. As described in Section 4.1.1.5.1 of the Draft EIR, the evaluation of potential impacts related to construction emissions is based on the peak daily emissions of criteria pollutants. As indicated in Table 4.1.1-6, as revised for the Final EIR (see Chapter F3, Corrections and Clarifications to the Draft EIR), the highest peak daily emissions are projected to occur in 2024. Given that the completion of Terminal 9, and the associated need for the interim roadway access, would not occur until several years later, the reduction in the construction-related emissions from elimination of the interim roadway access would

not change the significance conclusion of the Draft EIR. Similarly, the approach to evaluating construction-related noise impacts is based on a conservative worst-case analysis that, as described in Section 4.7.3.2.2 of the Draft EIR, assumes all construction equipment is operating simultaneously throughout a 24-hour day and the projected construction noise levels are calculated based on the shortest distance between the edge of construction and the nearest noise-sensitive uses. The noise impacts associated with construction of the interim roadway access would fall within the parameters of Draft EIR impacts analysis, recognizing that the actual impacts would like be much less than projected in the Draft EIR (i.e., not all equipment would be operating simultaneously around the clock and the distance between the construction activity and the nearest noise-sensitive receptor would be greater than assumed in the Draft EIR). Regarding reduction of GHG emissions associated with elimination of the interim roadway access, that reduction would be inconsequential relative to the significance conclusions of the Draft EIR. As presented in Section 4.4.5.1 of the Draft EIR, constructed-related GHG emissions were estimated for each year of Project construction and included emissions from off-road equipment and on-road trucks, and increases in GHG emissions from aircraft during temporary runway closures for the proposed airfield improvements (see Table 4.4-3 of the Draft EIR, as revised for the Final EIR in Chapter F3, Corrections and Clarifications to the Draft EIR, and Table 4.4-4 of the Draft EIR). As shown in the revised Table 4.4-5, the total GHG emissions from all sources combined over the full course of construction were amortized over a 30-year period. Based on that approach, the reduction in construction-related emissions associated with elimination of the interim roadway access would only be a fraction of the total annual emissions during the later portion of the overall Project construction program (because construction of the interim roadway access would likely occur sometime between 2026 and 2028), which, in turn, would be only a very small fraction of the total combined construction emissions that are then amortized over a 30-year period.

ATMP-AL006-17

Comment: 15. Section 4.8 of the DEIR does not include supplemental analysis of Level of Service impacts, the potential severity of those impacts, and consideration of what, if any, mitigation measures could have been derived from that analysis. For a project of this magnitude, particularly one that results in significant and unavoidable Transportation impacts based on a VMT analysis, the project site and surrounding communities could significantly benefit from mitigation that goes above and beyond the mitigation proposed to lessen the severity of VMT impacts. The City requests a supplemental Level of Service analysis and consideration of additional, related mitigation measures or conditions of approval. Said supplemental evaluation should include an analysis of short-term roadway impacts, specifically along Sepulveda Boulevard, during construction of all proposed roadway improvements. The analysis should specify and consider any necessary closures for all Sepulveda Boulevard travel lanes and should identify associated detours.

Response: Please see Topical Response TR-ATMP-T-1 regarding the assessment of transportation effects associated with the LAX Airfield and Terminal Modernization Project that are not subject to CEQA, which was conducted in accordance with the City of Los Angeles

Transportation Assessment Guidelines. As indicated therein, a Level of Service (LOS) and traffic congestion analysis is no longer used as a basis for determining significant transportation impacts under CEQA in California.

ATMP-AL006-18

Comment: 16. Section 4.8 of the DEIR states that LAWA has committed to annual monitoring of the effectiveness of VMT reduction strategies up to a point where the VMT per employee performance goal of 20.4 (or VMT equivalent) is achieved for three consecutive years. The short-termed nature of this commitment jeopardizes efficiency of the proposed and existing roadways systems; as the VMT performance goals may not be achieved in year four or five, for example, of the consecutive three-year period. The City requests that annual monitoring of VMT reduction strategies continue through 2045 to align with the regional aviation activity forecast and to provide assurance to the neighboring communities that project-related VMT impacts will remain a priority in the long term.

Response: As noted by the commenter, the duration of the VMT monitoring program is indicated in Section 4.8.5.2.2 of the Draft EIR as being for a period of three years of sustained VMT reduction from the applicable Project employment VMT baselines. LAWA has revised the Final EIR to extend that period to five years of sustained VMT reduction as reflected in Chapter F3, Corrections and Clarifications to the Draft EIR; see Topical Response TR-ATMP-T-2. That monitoring duration is considered sufficient to demonstrate the efficacy of the VMT reduction measures being implemented.

ATMP-AL006-19

Comment: The City of Manhattan Beach appreciates the opportunity to provide comments on this DEIR. Please include the City in all future CEQA and project notifications for this project.

Response: This comment is noted. The City of Manhattan Beach has been added to the Project mailing list to receive future notices related to the proposed Project.

ATMP-AL007	**Massey, Mayor Justin**	**City of Hermosa Beach**	**3/15/2021**

ATMP-AL007-1

Comment: Thank you for the opportunity to comment and for accepting the City of Hermosa Beach's comments on Los Angeles World Airports' (LAWA) draft Environmental Impact Report (DEIR) for the proposed LAX Airfield & Terminal Modernization Project (ATMP). As explained below, we respectfully request that LAWA address certain issues in a revised DEIR. Specifically, we request that a revised DEIR:

1. Include alternatives that evaluate the ability of "alternative locations" to meet more of the projected regional air travel demand;

2. Disclose the project's tradeoffs between short- and long-term effects;

3. Completely analyze the project's direct impacts including larger regional impacts;

4. Accurately describe and disclose the growth inducing impacts of the project; and

5. Provide innovative, enforceable solutions that mitigate the project's significant air quality and greenhouse gas impacts to the fullest extent possible.

(See State CEQA Guidelines, § 15088.5 [recirculation of DEIR when significant new information is added after public notice of the availability of the DEIR].) The City of Hermosa Beach has also reviewed comments prepared by the City of Manhattan Beach and joins those comments.

Response: LAWA thanks the City of Hermosa Beach for its review of the Draft EIR. Please see Responses to Comments ATMP-AL007-2 through ATMP-AL007-14 below which address comments received from the City of Hermosa Beach, including those summarized in this comment. The commenter's request that LAWA prepare a revised Draft EIR is noted. As stated later in this comment, the requirements for recirculation of a Draft EIR are identified in Section 15088.5 of the State CEQA Guidelines. The information provided in the responses to the comments raised in this comment letter do not meet the criteria that require preparation and recirculation of a revised Draft EIR.

Please also see the responses to comment letter ATMP-AL006 that address comments on the LAX Airfield and Terminal Modernization Project Draft EIR submitted by the City of Manhattan Beach.

ATMP-AL007-2

Comment: Hermosa Beach's concerns arise primarily from LAWA's decision to permit a roughly 50% increase in annual passenger travel through LAX over the next 24 years, limited only by the infrastructure (i.e. "functional components") at LAX. While we value LAWA and LAX as a significant contributor to the mobility and economic health of our region, the ATMP should evaluate a smaller increase in travel through LAX and provide a full evaluation of the ATMP and mitigation of its significant impacts.

Project Objective/Purpose

Section 1.1.3 of the DEIR provides, in pertinent part, that the objective and purpose of the ATMP is to "support the ongoing modernization of LAX, to provide excellent passenger service, to support the economic growth and prosperity of the Los Angeles region, and to work closely with neighboring communities to reduce airport-related impacts. . . . <u>These improvements [to LAX] would help LAX to prepare early for the</u>

continued aviation growth that is projected by LAWA, [SCAG], and the [FAA] to occur at LAX over the next several decades." (Emphasis added; see also Section 2.3.1 [similar].)

Table 2-1 of the DEIR indicates the "continued aviation growth" at LAX is an increase in "million annual passengers" (MAP) from 84.56 in 2017 to 127 in 2045. That projected growth is attributed to a SCAG document, but Section 6.3.2 and Appendix B of the DEIR indicate it derives from LAWA's August 2020 ATMP Draft Activity Forecasts Report. (See SCAG, Connect SoCal, Tbl. 3.3.) As indicated in Section 4.1 of Appendix B of the DEIR, LAWA's forecast of 127 MAP at LAX in 2045 is constrained only by "three categories of functional components" at LAX: "airfield . . . ; terminal . . . ; and landside . . . ."

In short, the "continued aviation growth" at LAX does not derive from a considered plan, but is rather the maximum number of passengers LAX can serve. This echoes the "'chicken and egg' pattern" of LAWA representing projects as needed to meet "continued aviation growth" that actually enable continued unconstrained growth at LAX, as discussed in paragraph 3 of the City of Manhattan Beach's comments on the DEIR. The DEIR does not consider or explain the extent to which LAWA and SCAG can and should limit the passengers served at LAX as part of a considered, regional plan to meet aviation growth regionally – sometimes referred to as "regionalization." The DEIR should clearly state how LAWA and SCAG can and have planned to meet aviation growth regionally, as opposed to the process reflected in the DEIR, which simply ties the purpose of the ATMP to meeting the maximum amount of projected growth at LAX, which is presented as a product of SCAG instead of LAWA, and then proposing projects to facilitate that maximum amount of projected growth at LAX.

Response: Contrary to the commenter's assertion, the aviation activity forecast prepared for the LAX Airfield and Terminal Modernization Project does not represent LAWA's "decision to permit a roughly 50% increase in annual passenger travel." The aviation activity forecasts were developed to provide "estimates of future activity" through the forecast period, as documented in Section 1 of Appendix B.1 of the Draft EIR. Please See Topical Response TR-ATMP-G-1 for background information on forecasting and inherent associated uncertainties.

In response to the commenter's requests that LAWA evaluate "a smaller increase in travel through LAX," such an evaluation would not reflect the fact that the level of activity (i.e., "travel through") at LAX in 2028, which is the impacts analysis horizon year in the Draft EIR, is projected to occur regardless of whether or not the proposed Project is implemented (See Section 2.3.1.2). The projected future level of activity/travel at LAX in the future, with or without the Project, is substantiated by the data presented in Appendix B.1 of the Draft EIR. The Draft EIR provides a full evaluation of potential impacts and recommended mitigation measures based on that projected activity level. To assume a smaller increase in travel through LAX (i.e., a lower level of activity) would not reflect the aviation demand forecast completed for LAX and, if anything, would underestimate impacts that are based on future activity levels.

The commenter's assertion that the LAX Airfield and Terminal Modernization Project forecasts were "attributed" to the Southern California Association of Governments (SCAG) is erroneous. Section 2.3.1.2.1 of the Draft EIR states that SCAG Aviation Program

Staff reached out to each airport in the region to "incorporate individual airport forecasts", as also documented in SCAG's Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) or Connect SoCal. Therefore, the Draft EIR clearly disclosed the process through which the forecasts were prepared by LAWA's aviation experts (see Appendix B.1 of the Draft EIR) and the fact that these forecast results were provided to SCAG.

Contrary to the commenter's assertion, Section 4.1 of Appendix B.1 did not state that LAX was "constrained" by three categories of functional components (i.e., airfield, terminal, and landside). Section 4.1 discusses how the constrained demand scenario development process would identify which system component would limit LAX's ability to accommodate unconstrained forecast activity levels. As further concluded in Section 4.3 of Appendix B.1, the airfield component would be the first of the three components to constrain the ability of LAX to accommodate forecasted unconstrained demand. This constraint would arise, and thereby limit LAX's ability to accommodate demand, before LAX would encounter constraints at the terminal or landside components. This would remain true so long as improvements at LAX do not increase the capacity of the airfield to accommodate demand.

Contrary to the commenter's assertion, the forecasts prepared for the LAX Airfield and Terminal Modernization Project do not represent "the maximum number of passengers LAX can serve." As documented in Section 1 of Appendix B.1 of the Draft EIR, passenger demand was forecasted independently from any existing or future limitations (e.g., physical, operational, or regulatory). Passenger demand was forecasted based on projected economic activity and socioeconomic factors, as documented in Section 2.2 of Appendix B.1 of the Draft EIR. Please also see Topical Response TR-ATMP-G-1 for additional information associated with the forecasting process. Therefore, as documented in Section 2.3.2.2 of the Draft EIR, the proposed Project improvements were formulated to accommodate future growth at LAX.

An analysis of regionalization is not required by CEQA and was, therefore, not conducted for the purposes of the LAX Airfield and Terminal Modernization Project Draft EIR. However, demand at other airports in the region was analyzed, as documented in Section 3.2.2 of Appendix B.1 of the Draft EIR. As discussed in Section 4 of Appendix B.1 of the Draft EIR, LAX's share of the region's Origin and Destination (O&D) volume of passenger would gradually decrease under the constrained demand scenario, suggesting that passenger demand would be accommodated by other airports in the region. Additionally, Section 5.4.1.1 of the Draft EIR evaluated the potential for alternative locations, such as elsewhere within the region, and concluded that such an alternative would not meet the objectives of the proposed Project.

ATMP-AL007-3

Comment: Range of Alternatives

Despite Hermosa Beach's distance from LAX, the airport's effects on our city's residents can be seen through the following three significant and unavoidable impacts identified in the draft EIR:

-Transportation. The entire South Bay area will experience added traffic congestion when accessing the airport and traveling to and from the west side of Los Angeles and points north.
-Aircraft Noise. Noise from aircraft flying over Hermosa Beach affects the quality of life in our community. The ATMP will increase these disturbances.
-Air Quality and Greenhouse Gases. Air pollution and an increase in greenhouse gas emissions resulting from the project will affect the communities surrounding LAX and beyond.

In the DEIR, these three impacts are identified as significant and unavoidable, even after the project's mitigation measures are implemented. (See DEIR, pp. 1-24 to 1-25.) Given these impacts, the DEIR is required to evaluate a reasonable range of alternatives. (Pub. Resources Code, § 21002.1; State CEQA Guidelines, section 15126.6.) While there is no "iron clad" rule governing the nature or scope of the alternatives in an EIR, the range must be reasonable. (State CEQA Guidelines, § 15126.6(a), (f).) For an alternative to be feasible, the lead agency must take into account site suitability, economic viability, availability of infrastructure, and the regional context for projects with a regionally significant impact. (Id.)

Clarity on the process, purpose, and objectives that underlie the ATMP will clarify the reasonableness of the range of alternatives in the DEIR. Section 5.4.1.1 of the DEIR, for example, explains that "no feasible alternative locations exist" because the "underlying purpose of the proposed Project is to support the ongoing modernization of LAX." As noted, however, the current purpose of the ATMP is to serve the maximum number of passengers LAX can serve. If the purpose of the ATMP is instead to help meet projected growth in regional aviation demand, the DEIR should show that LAX has to maximize the number of passengers it serves to meet that demand. If projected growth is met regionally, "alternative locations" for airfield and terminal modernization are reasonable.

Reasonable alternatives to the ATMP exist that would feasibly accomplish the objectives of meeting continued aviation growth while avoiding or substantially lessening one or more of the significant impacts of the ATMP in the DEIR. Specifically, as noted above, the DEIR should evaluate one or more alternatives that better regionalize air travel. This is particularly timely because, while the DEIR indicates Ontario will significantly increase its role in meeting regional demand, several other regional airports are not increasing their role to meet regional demand. (DEIR, Table 2-1.) This includes airports that have completed and are exploring facility expansion and upgrades. (See SCAG, Aviation and Airport Ground Access, p. 32 ["Palmdale Regional Airport is currently exploring options for scheduled commercial passenger service, and San Bernardino International Airport has recently completed construction on new domestic and international passenger

terminals."].) The DEIR should be revised to include a reasonable range of alternatives, including regional alternatives. (See State CEQA Guidelines, section 15088.5)

Regional alternatives are feasible and should be considered in the DEIR to disclose to LAWA and the public how air traffic can be managed regionally to reduce (or eliminate) the significant impacts of the ATMP. (See State CEQA Guidelines, § 15126.6 [key question when considering alternative locations is whether any significant effects of the project would be avoided or substantially lessened].)

Among other things, regional alternatives would: (1) avoid the project's significant traffic, noise, air quality and GHG emissions impacts; (2) be feasible based on existing and planned air traffic infrastructure in the region; and (3) meet the objective and purpose of meeting continued aviation growth, supporting the modernization of LAX to provide excellent passenger service, supporting economic growth and prosperity of the LA region, and working closely with LAX's neighboring communities. (DEIR, p. 1-4.)

Response: Impacts of the proposed Project with respect to air quality, greenhouse gas emissions, noise, and transportation are addressed in, Section 4.1, Section 4.4, Section 4.7, and Section 4.8 of the Draft EIR, respectively. Regarding the commenter's concern about traffic congestion, please see the introduction to Section 4.8 of the Draft EIR and also refer to Topical Response TR-ATMP-T-1 regarding the fact that traffic congestion is no longer an environmental impact under CEQA. Regarding the commenter's concern about aircraft noise impacts to Hermosa Beach, Figures 4.7.1-6 and 4.7.1-7 of the Draft EIR depict the aircraft noise contours associated with operations at LAX for current (2018) conditions and projected for future (2028) With Project conditions, respectively. The 65 dB Community Noise Equivalent Level (CNEL) is the threshold of significance used in evaluating impacts to noise-sensitive uses. As shown in the aforementioned figures, the 65 CNEL contour for existing and future aircraft operations at LAX extends approximately 0.6 mile south from the edge of LAX. The City of Hermosa Beach is located over 3.5 miles south of LAX, as measured from its nearest boundary. As such the existing and future LAX-related aircraft noise levels in Hermosa Beach are now, and are projected to be, well below the threshold of significance. Regarding the commenter's concern about air quality and greenhouse gases, the Draft EIR acknowledges that the related impacts can extend well beyond the immediate vicinity of LAX and that, even with mitigation, air quality and greenhouse gases impacts would be significant and unavoidable. The Draft EIR includes a reasonable range of alternatives that were evaluated relative to the potential to avoid or substantially reduce significant impacts, as further described below.

The commenter is incorrect in stating that "the current purpose of the ATMP is to serve the maximum number of passengers LAX can serve" and provides no supporting basis for that assertion. As correctly stated by the commenter, the Draft EIR, specifically Section 2.3.2, indicates that the underlying purpose of the proposed Project is to support the ongoing modernization of LAX. As explained in Section 2.3.1, which provides the background to the Project Objectives, the aviation demand forecast prepared for LAX projects a future passenger activity level of 110.8 million annual passengers (MAP) in 2028. That future activity level could be accommodated by existing facilities at LAX, without the proposed Project improvements, but the quality of passenger service and the operational efficiencies in accommodating that activity level would be very poor.

Please see Section 2.3.1.2 and Appendix B.1 of the Draft EIR for further information on the proposed Project as relates to projected future growth at LAX. Please also see Topical Response TR-ATMP-G-1 regarding the forecast of future aviation and passenger activity at LAX.

Regarding the commenter's statement on regional aviation demand, please see Response to Comment ATMP-AR002-2.

The commenter asserts that the LAX Airfield and Terminal Modernization Project Draft EIR does not evaluate a reasonable range of alternatives; however, Chapter 5 of the Draft EIR presents and evaluates a reasonable range of alternatives, and includes a discussion of alternatives that were considered but not carried forward for analysis for the reasons stated in Section 5.4.1. Included among the alternatives not carried forward for analysis was the concept of alternative locations, such as suggested by the commenter. As explained in Section 5.4.1.1, the underlying purpose of the proposed Project is to support the ongoing modernization of LAX. An alternate location would not meet any of the proposed Project's purpose and objectives. Moreover, LAWA does not have the ability to reasonably acquire, control, or otherwise have access to any alternative site, including any of the other existing regional airports, where the proposed Project's purpose and objectives would be able to be achieved. Of particular relevance is the fact that, as noted above, the aviation demand forecast for LAX estimates that passenger demand will reach 110.8 MAP in 2028 regardless of whether the improvements associated with the proposed Project are implemented. Making improvements at other airports in the region instead of at LAX would not diminish the projected passenger levels anticipated to occur at LAX but, rather, would compromise LAWA's ability to accommodate that future growth efficiently and with good quality passenger service. In short, without the proposed Project-related improvements, ongoing modernization of LAX would not be fully realized and the purpose of the Project would not be met.

The commenter asserts that a regional alternative would avoid the proposed Project's significant and unavoidable impacts and that a regional alternative would be feasible based on existing and planned air traffic infrastructure in the region; however, the commenter does not provide any substantiation for these assertions. Additionally, it should be noted that shifting aviation activity from LAX to other airports in the region, under the regional alternative concept, may reduce operations-related impacts around LAX but, in turn, would increase operations-related impacts in the communities surrounding those other airports and could result in greater impacts on balance than would the proposed Project.

ATMP-AL007-4

Comment: Mandatory Findings of Significance

The DEIR should disclose all of the environmental impacts of the proposed project. Specifically, the DEIR should discuss the project's potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals, as CEQA requires. (State CEQA Guidelines, § 15065(a).) The significant and unavoidable impacts

of this project will diminish the region's quality of life immediately and long-term. As a result, the project would achieve short-term environmental goals to the disadvantage of long-term environmental goals. (See State CEQA Guidelines, § 15065(a)(2) [the project has the potential to achieve short-term environmental goals (e.g., relieving traffic congestion on Sepulveda Boulevard) to the disadvantage of long-term environmental goals (reducing traffic congestion and vehicle miles travelled, generally)].) Thus, LAWA has an obligation to disclose, analyze, and mitigate these impacts. From the moment construction begins, this project will contribute constant, widespread, and significant impacts to the environmental quality of LAX's neighboring communities by maximizing air travel in and out of LAX. (State CEQA Guidelines, § 15065(c).) LAWA should make every effort possible to vet these impacts and ensure that the aviation growth to be accommodated is the result of a considered plan and the impacts of that growth are mitigated to the maximum extent feasible. (State CEQA Guidelines, § 15126.4.)

Response: Section 15065(a)(2) of the State CEQA Guidelines, cited by the commenter, applies to mandatory findings of significance a lead agency must make when determining if an EIR is required to be prepared for a proposed Project. Following preparation of an Initial Study in 2019, LAWA determined that an EIR would be prepared for the proposed Project. Section 15126.2 of the State CEQA Guidelines requires a lead agency to consider both short-term and long-term effects when identifying significant environmental impacts of a project in an EIR although it does not require the lead agency to weigh short-term environmental goals against long-term environmental goals, which is a consideration in Section 15065(a)(2). In accordance with Section 15126.2, the Draft EIR analyzed and disclosed both short-term and long-term effects of the proposed Project in Chapter 4 of the Draft EIR, including the proposed Project's construction impacts. For example, the Draft EIR identified significant short-term impacts related to criteria pollutant emissions and aircraft noise during the temporary closure of the north airfield runways during construction (see Section 6.1 of the Draft EIR). Feasible mitigation measures are identified throughout Chapter 4 that would reduce significant short-term and long-term impacts, including significant construction-related impacts.

Regarding the commenter's statement that the proposed Project would maximize air travel at LAX, please see Response to Comment ATMP-AL0007-3.

ATMP-AL007-5

Comment: Specific Environmental Impact Concerns

We additionally want to reassert the concerns expressed by neighboring communities of the South Bay, which have been submitted to LAWA in separate communications. These shared concerns address overall policy strategies to help encourage LAWA to rethink the scope of this project. Each of these points listed below simultaneously offer possible solutions and mitigation measures that may help to reduce this project's impact on the environmental health and quality of life in the region.

Response: Please see Responses to Comments ATMP-AL007-6 through ATMP-AL007-9 below, which address the comments received from the City of Hermosa Beach on specific

environmental impact concerns associated with the LAX Airfield and Terminal Modernization Project.

With respect to the commenter's reference to concerns expressed by neighboring communities of the South Bay, please see the responses to comment letter ATMP-AL004, which address comments on the LAX Airfield and Terminal Modernization Project Draft EIR submitted by the City of Redondo Beach; responses to comment letter ATMP-AL005, which address comments submitted by the City of Rancho Palos Verdes; responses to comment letter ATMP-AL006, which address comments submitted by the City of Manhattan Beach; responses to comment letter ATMP-AL010, which address comments submitted by the City of El Segundo; responses to comment letter ATMP-AL011, which address comments submitted by the City of Inglewood; responses to comment letter ATMP-AL012, which address comments submitted by the City of Carson; and responses to comment letter ATMP-AR002, which address comments submitted by the South Bay Cities Council of Governments.

ATMP-AL007-6

Comment: 1. Enhanced Regionalization. Hermosa Beach strongly supports prioritizing efforts to regionalize air traffic to airports such as Ontario, Palmdale, and San Bernardino. There have been earlier efforts made at regionalization, including as part of a 2006 court settlement over expansion plans at LAX. However, those efforts have not materialized and have not been revisited in the 15 years since as major populations now live in the outlying areas around these regional airports. Regionalization will not only help minimize the impacts of growth on LAX's neighboring communities, it will help expand the economic benefits of increased air traffic to communities who may not have previously benefitted and will provide much greater convenience for large areas of the population of the region.

Response: The content of this comment is substantively the same as comment ATMP-AR002-2 from the South Bay Cities Council of Governments (SBCCOG); please refer to Response to Comment ATMP-AR002-2.

ATMP-AL007-7

Comment: 2. Traffic Impacts to the South Bay. The draft EIR should adequately evaluate impacts to transportation from the South Bay to and through the LAX area. We understand LAWA is required to analyze transportation impacts using the vehicle miles traveled (VMT) metric. (Pub. Resources Code, § 21099; *Citizens for Positive Growth and Preservation v. City of Sacramento* (2019) 43 Cal.App.5th 609.) Use of VMT should not obscure the increased congestion that will result from expanding LAX to 127 MAP. That congestion will directly impact the environment (e.g., increased vehicle idling, which, in turn, leads to increased air pollutant emissions). Thus, in addition to VMT, LAWA should evaluate vehicle hours travelled (VHT) and level of service (LOS) to disclose congestion impacts and mitigate them to the extent feasible. (See State CEQA Guidelines, §§ 15065(a)(1) [does the project have the potential to substantially degrade the quality of the

environment] & 15065(a)(4) [would the environmental effects of a project cause substantial adverse effects on human beings, either directly or indirectly]; see also *Joshua Tree Downtown Business Alliance v. County of San Bernardino* (2016) 1 Cal.App.5th 677, 689 [project may have impacts beyond the finite questions set forth in an EIR and lead agencies must tailor environmental documents to address those impacts]; see also *Protect the Historic Amador Waterways v Amador Water Agency* (2004) 116 Cal.App.4th 1099 [fact that impact question is not included in Appendix G does not determine whether the issue must be evaluated in an EIR].) In particular, LAWA should work with other stakeholders such as the South Bay Cities Council of Governments (SBCCOG), LA Metro, CalTrans, and surrounding cities who have been working together to identify freeway improvements to address off site roadway mitigation improvements necessitated by this project. For example, it may prove beneficial for LAWA to work with other implementing agencies to address the Century Boulevard exit on the northbound I-405 to allow motorists to head west on Century Boulevard without the need for a traffic signal.

Response: The EIR includes an analysis of the proposed Project's potential air quality impacts, including those associated with vehicular travel. Please see Section 4.1.1.5.2 of the Draft EIR which addresses the proposed Project's operational air pollutant emissions; these emissions include those that would occur as a result of vehicles traveling to and from LAX.

Please see Topical Response TR-ATMP-T-1 regarding the assessment of transportation effects associated with the LAX Airfield and Terminal Modernization Project that are not subject to CEQA, which was conducted in accordance with the City of Los Angeles Transportation Assessment Guidelines and with State law (SB 743; CEQA Guidelines, § 15064.3). As indicated therein, traffic congestion is no longer used as a basis for determining significant impacts for land use projects and plans in California.

As described in Section 2.3.1.2.1 of the Draft EIR, the future passenger activity level of 127 million annual passengers (MAP) represents a long-term growth projection for the year 2045 that was developed in conjunction with the Southern California Association of Governments 2020 update to the Regional Transportation Plan/Sustainable Communities Strategies. The Draft EIR analysis horizon year is 2028, which is the anticipated buildout year for the proposed Project. The passenger activity level projected for 2028 is 110.8 MAP, which is anticipated to occur with or without the proposed Project (i.e., the proposed Project is not the cause of that growth). Please also see Topical Response TR-ATMP-G-3 for additional discussion regarding why 2028, not 2045, is the appropriate horizon year for addressing the environmental impacts of the proposed Project.

Section 4.8.5.2.2 of the Draft EIR presents Mitigation Measure MM-T (ATMP)-1, which is a comprehensive VMT reduction program for the proposed Project. Measures to reduce VMT also serve to reduce air pollutant and GHG emissions. That mitigation approach is consistent with the intent of the CEQA revisions regarding how to address transportation impacts (i.e., focus on reducing VMT), rather than focusing on identifying freeway improvements that may reduce traffic congestion.

ATMP-AL007-8

Comment: 3. Terminal 9. We appreciate LAWA's commitment to eliminate permanent access from Sepulveda Boulevard to Terminal 9. However, temporary access is possible if Terminal 9 opens before the aerial roadway system is complete. A lead agency must analyze a project's short-term, temporary impacts. (See State CEQA Guidelines, § 15126.2(a) [lead agency should evaluate both "short-term and long-term conditions"]; *Neighbors for Smart Rail v. Exposition Metro Line Construction Authority* (2013) 57 Cal.4th 439, 455.) If merging movements within the Sepulveda tunnel are already problematic, they may worsen with a temporary access to Terminal 9. There will already be access to Terminal 9 via Century Boulevard and the new Jet Way Street, which are not dependent on the construction of the aerial roadway. We urge LAWA to eliminate access from Sepulveda Boulevard. If a third point of access to Terminal 9 is deemed necessary, we request that Terminal 9 open only when the aerial roadway system is completed and operational.

Response: Providing temporary roads to Terminal 9 is a construction implementation option, if needed to provide interim access while the permanent roadway improvements are being completed (see Section F3, Corrections and Clarifications to the Draft EIR, for that clarification). The type of short-term temporary impacts described in the comment appear to be related to traffic congestion and delay. As described on page 4.8-18 of the Draft EIR, regulatory changes at the State level have resulted in the "elimination of auto delay, LOS, and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts for land use projects and plans in California." Please see Topical Response TR-ATMP-T-1 regarding CEQA transportation analysis requirements.

ATMP-AL007-9

Comment: Growth Inducing Impacts

Growth Projections. Although LAWA (and SCAG) project the maximum air traffic growth LAX can serve regardless of the ATMP, it will benefit all stakeholders to re-evaluate growth projections, especially in light of the long-term impacts of COVID-19. Although the current downturn in air traffic will likely rebound in the coming years, it is important to evaluate the long-term behavioral changes accelerated by the pandemic. For example, population centers may shift inland in the next 25 years due to the ability to work remotely and business travel may not return to previous levels.

Response: Please see Topical Response TR-ATMP-G-1 regarding the aviation demand forecast for LAX and the COVID-19 pandemic context. LAX has recently shown signs of post-pandemic recovery. The Draft EIR evaluates and discloses the impacts of the proposed Project when it would be fully operational in the buildout year of 2028. As a result of the COVID-19 pandemic, impacts analyzed in the Draft EIR are most likely commensurate to higher levels of activity than will actually occur in 2028. Thus, the Draft EIR's analysis of impacts related to passenger activity levels in 2028 can be considered conservative. Further, there is no evidence at this time that the COVID-19 pandemic has resulted in

long-term behavioral changes that would shift population centers in any way that would impact the Draft EIR's aviation activity forecast. Therefore, the aircraft operation and passenger forecasts prepared for the Draft EIR do not need to be revised.

It must be noted that the forecasts prepared for the LAX Airfield and Terminal Modernization Project Draft EIR do not represent the "maximum air traffic growth LAX can serve", as asserted by the commenter. Please see Response to Comment ATMP-AL010-48 for additional information related to the activity levels forecasted in 2045 and their significance.

ATMP-AL007-10

Comment: Additionally, as noted above, we request that LAWA, SCAG, and the region's airport operators plan now – before the ATMP is considered or approved – to meet regional aviation growth through regional airports at Ontario, Palmdale, San Bernardino, and across the region. If infrastructure improvements are needed to enable those airports to accommodate a larger share of regional growth, implementation of those improvements should be an immediate top priority of the region. Otherwise, LAX will grow simply because LAWA, SCAG, and the region's airport operators have not committed the resources to accommodate regional aviation growth regionally, and LAX will continue to grow without a considered, regional plan because only LAX will have the necessary facilities.

Response: The content of this comment is similar to comment ATMP-AR002-2; please refer to Response to Comment ATMP-AR002-2 for a discussion of regional airports and facilities.

ATMP-AL007-11

Comment: An EIR must describe the growth-inducing impacts of the proposed project. (Pub. Resources Code, § 21100(b)(5); State CEQA Guidelines, § 15126(d).) There is reason to believe the ATMP will induce growth. (Manhattan Beach, DEIR Comments, ¶ 3 ["'chicken and egg' pattern" of growth at LAX]; see e.g. State CEQA Guidelines, § 15126.2(e) [certain infrastructure projects remove obstacles to future use or growth; here, expansion of the core project components would improve user-experience, draw additional travelers, and enable and induce further growth, with corresponding impacts].)

Response: The Draft EIR addresses growth inducing impacts in Section 6.3. As discussed there, and elsewhere throughout the Draft EIR, future increases in passenger activity levels at LAX will occur with or without the proposed Project. Potential growth inducing impacts associated with the proposed Project improvements were appropriately analyzed. Operational changes associated with the proposed Project improvements were simulated and documented in Appendix B.2 of the Draft EIR, as summarized in Section 2.3.1.2.2 of the Draft EIR. Please see Response to Comment ATMP-AL010-205 for a discussion of the relationship between the proposed Project airfield improvements and induced growth. Please see Topical Response TR-ATMP-G-1 for further discussion of the validity of LAWA's aviation forecast.

ATMP-AL007-12

Comment: Greenhouse Gas Emissions

Reduced air quality and greenhouse gas (GHG) emissions are the most widespread and enduring impact on the region and the planet of the ATMP. As mentioned above and detailed in Section 4.4 of the DEIR, the ATMP will have significantly increase air pollution and GHG emissions from LAX, even after proposed mitigations. However, many of the strategies described in the EIR are simply reiterations of existing programs and "business as usual" approaches that are insufficient to mitigate the impacts of the ATMP. For example, mitigation measure 4.4.5.1.4 requires mandatory diversion of construction and demolition waste and organic material. But, diversion of construction and demolition waste and organic material is already required and would not reduce GHG emissions to less than significant levels. While existing regulations can mitigate project impacts, if the ATMP will have residual impacts after imposition of existing regulations, LAWA must identify additional mitigation measures that reduce the impact further. In other words, mitigation measures should go "above and beyond" existing regulations. To that end, the City of Hermosa Beach requests that the DEIR impose more innovative and comprehensive mitigation measures to further reduce air pollution and GHG emissions, particularly once the ATMP is operational.

Response: As presented in Sections 4.1.1.5.1.2 and 4.4.5.1.4 of the Draft EIR, a variety of mitigation strategies would be employed to reduce Project-related emissions of criteria pollutants and greenhouse gases (GHGs). LAWA has proposed a total of 11 mitigation measures that would reduce GHG emissions. In addition, one of the mitigation measures LAWA has proposed to address transportation impacts (Mitigation Measure MM-T (ATMP)-1, Vehicle Miles Traveled (VMT) Reduction Program) would also reduce GHG emissions. Sections 4.1.1.2.7 and 4.4.2.3 of the Draft EIR identify existing policies and Project features that would also reduce emission of criteria pollutants and GHGs associated with the Project; these existing policies and proposed Project features are not considered to be mitigation measures because, as noted by the commenter, they are already required. In developing the proposed mitigation measures, a broad array of measures for the reduction of emissions was identified and considered. This array of potential measures, presented and evaluated in Appendix C.9 of the Draft EIR, was compiled from a multitude of sources, including the Federal Aviation Administration (FAA) Voluntary Airport Low Emission (VALE) grant program, the FAA Airport Zero Emission Vehicle (ZEV) and Infrastructure Pilot Program, the Airport Cooperative Research Program (ACRP) Sustainable Airport Construction Practices report, Appendix B to the California 2017 State Scoping Plan, and the South Coast Air Quality Management District (SCAQMD) Air Quality Analysis Handbook, Mitigation and Control Efficiencies. Over 90 unique measures were identified and evaluated. In many cases, the measures in Appendix C.9 have already been implemented by LAWA as part of existing airport programs, or would be implemented as a Project feature. All of the mitigation measures identified in the Draft EIR are "above and beyond" existing regulations or LAWA policies and programs. Specifically, the measure identified in the comment, MM-GHG (ATMP)-2, Organic Waste Collection and Diversion, would require that waste collection procedures at Concourse 0 and Terminal 9 conform with LAWA's Organic Waste Collection Program. This is currently a voluntary program, which LAWA would require as mandatory at Concourse

0 and Terminal 9. The commenter does not suggest any specific additional mitigation measures, and LAWA has not identified any additional feasible mitigation measures that would provide reductions of criteria pollutant or GHG impacts from their respective sources. The fact that the Draft EIR's mitigation measures do not reduce all air quality impacts to a less-than-significant level is not a legal deficiency. As the California Supreme Court has explained, "the inclusion of mitigation measures that partially reduce significant impacts does not violate CEQA." (*Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 524.) Lead agencies may approve a project when the feasible mitigation measures identified in the EIR cannot reduce GHG impacts or other impacts to a less than significant level. (*Clover Valley Foundation v. City of Rocklin* (2011) 197 Cal.App.4th 200, 244–245; *Cherry Valley Pass Acres & Neighbors v. City of Beaumont* (2010) 190 Cal.App.4th 316, 356–357; State CEQA Guidelines Section 15092.)

ATMP-AL007-13

Comment: LAX has been contributing significant greenhouse gas emissions for its entire existence and now, as it works to reinforce its permanence and vitality in the region, it should strive to develop pioneering and far-reaching emissions reductions programs and policies that complement its global renown. LAWA need not look far to find transportation hubs that have made innovative efforts to achieve emissions goals that stand as a global model for their respective industry. The ports of Long Beach and Los Angeles partnered on a San Pedro Bay Clean Air Action Plan that aims to improve emissions from all sources associated with the ports. As one of the busiest port facilities in the world, it was recognized that the environmental impacts of the ports are acutely significant on the region and that only innovative and comprehensive strategies would achieve its environmental goals. LAWA should employ a similar strategy that encompasses the operations and impacts of all facilities, tenants, partners and visitors at LAX. For instance, requiring increased usage of alternative aviation fuel would reduce the impacts of the ATMP at and around LAX and at the many destinations to and from which the aircraft travel. LAWA should work with the FAA and airlines to require and memorialize such mitigation measures in the DEIR.

Response: This comment addresses GHG emissions associated with airport-wide operations, including "all facilities, tenants, partners, and visitors at LAX." Addressing airport-wide operations is beyond the scope of the proposed Project. However, it should be noted that, in 2019, LAWA adopted the Sustainability Action Plan, a comprehensive strategy for addressing energy use and GHG emissions from airport sources. Also in 2019, LAWA signed a Memorandum of Understanding (MOU) in partnership with the SCAQMD for the control and reduction of LAWA-controlled emissions of criteria air pollutants at LAX. These actions, in addition to LAWA's various ongoing emission reduction programs and policies, such as the LAX Ground Support Equipment (GSE) Policy and Alternative Fuels Program, reflect an organizational commitment and strategy, similar to that of the San Pedro Bay Clean Air Action Plan, for the control and reduction of criteria pollutants and GHGs by LAWA. Furthermore, in 2017, LAX achieved Level 3 accreditation under the Airports Council International (ACI) Airport Carbon Accreditation (ACA) program and has maintained this accreditation ever since. To maintain Level 3 accreditation under this program, LAWA develops annual airport-wide GHG emission inventories and actively

engages with third parties at the airport to demonstrate independently verifiable, three-year rolling average emission reductions for all direct and many indirect airport-related GHG emissions. Please see Response to Comment ATMP-AL007-12 regarding mitigation of Project-related GHG impacts. Please also see Topical Response TR-ATMP-AQ/GHG-1 regarding the evaluation of mitigation measures suggested by commenters to address significant air quality and/or GHG impacts.

ATMP-AL007-14

Comment: In conclusion, we thank you again for the opportunity to comment on the DEIR. We respectfully request that LAWA evaluate a smaller increase in travel through LAX as part of a full evaluation of the ATMP and mitigation of its significant impacts. As the ATMP and our region prepare to welcome visitors for the upcoming Olympic Games, we urge LAWA to lead an effort to not only just LAX, but to accommodate continued regional aviation growth in a manner that relies on well-planned, innovative, and thoughtful programs that position LAWA and LAX as a global leader for sustainable transportation.

Response: Please see Responses to Comments ATMP-AL007-2, ATMP-AL007-6, and ATMP-AL007-10 above regarding activity levels at LAX and regionalization. The comments from the City of Hermosa Beach will be included in the Final EIR for consideration by the decision-makers prior to taking any action on the LAX Airfield and Terminal Modernization Project.

ATMP-AL008	**Bonin, Councilmember Mike**	**City of Los Angeles**	**3/15/2021**

ATMP-AL008-1

Comment: In 2016, after more than a decade of litigation Los Angeles World Airports (LAWA) reached a landmark settlement agreement with ARSAC (Alliance for a Regional Solution to Airport Congestion), a Westchester-based neighborhood group representing residents in Playa del Rey and Westchester, that allowed for the much-needed modernization at LAX. I brokered that agreement and stood with the community in supporting the tough but fair compromise between ARSAC and LAWA. The agreement stopped the north runways from moving any farther north, and it represented a new way forward for LAX by formalizing the community's cry for "Modernization Yes; Expansion, NO!"

The projects that have since broken ground at LAX represent the fulfillment of that agreement. The Landside Access Modernization Program (LAMP) will reduce car traffic and air pollution by connecting LAX to LA Metro, our regional transportation network. The LAX Northside plan, now soliciting bids from prequalified developers, will provide community amenities like ball fields and athletic facilities, a dog park, neighborhood retail, and green space for Westchester and Playa del Rey. These are good projects for the community, and my constituents support them.

My constituents and I strongly value having a safe, modern, and efficient "world-class airport," while addressing the needs of airport neighbors who want to enjoy their communities without being unduly impacted by airport operations. Though I believe that LAX is building toward being a world-class airport, we can never lose sight of the complementary goal of making it a first-class neighbor. While the current Airfield and Terminal Modernization Project (ATMP) is a big improvement over previous modernization plans that would have decimated Westchester and Playa del Rey, we can still do better by ensuring that any growth in passenger traffic is positively experienced by airport neighbors through smart transportation planning and attention to reducing traffic and congestion in and around LAX. To that end, I write to you to reiterate the concerns that the Neighborhood Council of Westchester/Playa (NCWP), ARSAC, and I raised earlier, and add new opportunities for improving the project, in response to the Draft Environmental Impact Report (DEIR) for the ATMP.

I reiterate some of the concerns from my Notice of Preparation (NOP) letter I sent regarding this project a year ago; LAWA, as lead of the ATMP project, should address the following:

Response: LAWA thanks Councilmember Bonin for his review of the Draft EIR. The comment is noted and will be included in the Final EIR for consideration by the decision-makers prior to taking any action on the LAX Airfield and Terminal Modernization Project. LAWA has a long-standing history of working with your office, as well as with the Westchester and Playa del Rey communities and other stakeholders to address issues related to development at LAX. With respect to the LAX Airfield and Terminal Modernization Project, LAWA has met with your office and with community organizations, including the Neighborhood Council of Westchester/Playa (NCWP) and the Alliance for a Regional Solution to Airport Congestion (ARSAC), to describe the elements of the proposed Project, answer questions regarding the proposed Project, and discuss potential concerns, and is committed to working closely with you and the community during Project design and implementation.

LAWA understands that traffic and congestion in and around LAX is a key concern of your office and of the community. As discussed in Chapter 2 of the Draft EIR, the proposed Project includes a new roadway system that would help shift airport-related traffic off of major public streets, such as Sepulveda Boulevard, and on to elevated roadways dedicated to Central Terminal Area (CTA) access. The design and function of that new roadway system would help reduce congestion on Sepulveda Boulevard.

Please see Topical Response TR-ATMP-T-1 for additional discussion of traffic and congestion in and around LAX. As discussed in the topical response, based on State and local requirements, intersection level of service, congestion, and delay impacts are no longer considered impacts on the environment and, therefore, are not addressed in the Draft EIR. However, the Los Angeles Department of Transportation (LADOT) Transportation Assessment Guidelines include a separate set of guidelines for evaluating transportation impacts outside of the CEQA process, including intersection operations. In accordance with these guidelines, a Non-CEQA Transportation Assessment was completed for the proposed Project. The Non-CEQA Transportation Assessment Report

is available at https://www.lawa.org/atmp/documents; however, it does not pertain to the environmental impacts of the proposed Project and is entirely separate from the EIR for the proposed Project.

Responses to comments from NCWP are provided in the responses to comment letter ATMP-PC025; responses to comments from ARSAC are provided in the responses to comment letter ATMP-PC038. Responses to your additional comments are provided in Responses to Comments ATMP-AL008-2 through ATMP-AL008-13 below.

ATMP-AL008-2

Comment: • A complete streets assessment in collaboration with Caltrans of Sepulveda Boulevard is needed to address that corridor's degraded public space and safety concerns for pedestrian connections into the neighborhoods and business improvement districts I represent. Particular focus and remedies to improve pedestrian safety and reduce dangerous driver behavior at the intersection of Lincoln and Sepulveda are needed.

Response: The comment relates to a complete streets assessment in collaboration with Caltrans for Sepulveda Boulevard to address degraded public space and pedestrian safety concerns with an emphasis on the intersection of Lincoln Boulevard and Sepulveda Boulevard.

LAWA will coordinate with Caltrans to determine the appropriate study area and scope of evaluation for a local complete streets assessment on Sepulveda Boulevard, and then will prepare the complete streets assessment for submittal to, and review by, Caltrans. The complete streets assessment will include provisions for pedestrian access along Sepulveda Boulevard between the LAX Central Terminal Area and Westchester. With regard to pedestrian safety and improved traffic operations at the intersection of Sepulveda Boulevard and Lincoln Boulevard, LAWA will, in coordination with LADOT, be installing a camera system at the intersection, which will help LADOT manage the intersection signal operations during busy periods and reduce the potential for gridlock conditions that interfere with safe pedestrian crossing at the intersection. Additionally, LAWA has committed to work with LADOT's Parking Enforcement and Traffic Control Division to deploy Traffic Officers at that intersection during peak periods to help avoid or minimize gridlock conditions.

More details on this location will be available during the engineering design phase of the project. It should also be noted that where the proposed roadway system involves modifications to current sidewalks, LAWA will reconstruct those sidewalks in accordance with design standards from the Mobility Plan 2035 and city code.

ATMP-AL008-3

Comment: • Proposed roadway improvements are needed to create additional vehicle queuing capacity into the Central Terminal Area (CTA) to reduce the risk of back up into the intersection of Lincoln and Sepulveda. I echo the concerns of my constituents that feeding traffic into the Landside Access Modernization Project (LAMP) area east of

Sepulveda, with facilities like the ITF West, the Metro AMC Station, and the Con RAC is equally important to feeding traffic west into the congested Central Terminal Area (CTA). I have still not seen a detailed explanation as to why the double left hand turn pockets proposed at Sepulveda and 96th Streets as part of this project would not be better served by a roadway exit off of the new flyover bridges proposed in the ATMP DEIR that right now only lead to the CTA. Doubling down on providing convenience for drivers into the CTA, without an option to feed LAMP drop-off points outside of the CTA seems short-sighted, and could create new vehicle queuing capacity issues for left-bound drivers at 96th Street that the approximately $600 million roadway network proposed is trying to address.

Response: The future signalization of the intersection of Sepulveda Boulevard and 96th Street, including the provision of the double left-hand turn pockets on southbound Sepulveda Boulevard, is part of the approved LAX Landside Access Modernization Program. The primary function of that intersection improvement is to help convey airport-related traffic to the new ground transportation facilities currently under construction east of Sepulveda Boulevard, such as the Intermodal Transportation Facility (ITF) West. You ask why the roadway system proposed as part of the LAX Landside Access Modernization Program -- specifically, the proposed flyover ramps -- does not include an exit that would also help convey airport-related traffic to the new ground transportation facilities east of Sepulveda Boulevard. In conjunction with further planning of the proposed roadway system, LAWA investigated the potential to provide such an exit, but determined it to be infeasible. The most notable constraint influencing the location and design characteristics of the roadway system is the existence of the runway protection zone (RPZ) associated with Runway 6R-24L, which is shown in Figure 2-17 of the Draft EIR. As described in Section 2.4.3.2 of the Draft EIR, RPZs are designed to enhance the protection of people and property on the ground as related to aircraft operations on the runway. This is especially true relative to the placement of any structure within the RPZ that may penetrate the aircraft safety airspace area known as the "Part 77 Surfaces" (see Section 2.4.3.2.1 of the Draft EIR). The currently proposed roadway system has no components that are elevated above-grade within the RPZ area. The flyover ramp from southbound Sepulveda Boulevard does not start rising up until outside of the RPZ and then continues to rise for a distance of approximately 300 feet at which point it is at a height sufficient to turn east and cross over Sepulveda Boulevard to continue east parallel to 98th Street. As part of design work on the LAX Airfield and Terminal Modernization Project roadway system design, LAWA considered a design option to shift the flyover ramp northward so that it parallels 96th Street, which could offer the potential to provide an exit to continue east to the ITF West. This northward shift would, however, place the elevated ramp within the RPZ, which would be contrary to the safety objective of an RPZ. For this reason, the northward shift in the flyover ramp was determined to be infeasible. This determination took into consideration the design of the relevant LAX Landside Access Modernization Program improvements such as the location and design of the ITF West, and its associated roadway connections, recognizing that the design of those improvements was already set, that those improvements are already under construction, and that they are not part of the proposed LAX Airfield and Terminal Modernization Project. Because the design proposed in this comment remains infeasible, LAWA had determined that it is not appropriate to revisit this aspect of the LAX Landside Access Modernization Program roadway system.

With respect to your concern about Project-related traffic creating vehicle queueing issues for left-bound drivers at 96th Street, LAWA has worked closely with the City of Los Angeles Department of Transportation (LADOT) in evaluating such queueing issues at that intersection as part of the Non-CEQA Transportation Assessment required by LADOT. This analysis was performed in consultation with LADOT as a separate effort, rather than as part of the EIR. Based on that evaluation, LAWA proposes certain design refinements for that intersection including an additional right-turn lane for westbound traffic on 96th Street and an additional through/right-turn lane for northbound traffic on Sepulveda Boulevard. With the improvements, no queueing deficiencies are anticipated for any traffic movements at the intersection, including for the left-turn lanes on southbound Sepulveda Boulevard. LADOT has concurred with the conclusions and recommendations of the Non-CEQA Transportation Assessment that these design refinements will address potential queueing deficiencies at the intersection, such as those of concern identified in this comment letter. It should be noted that the subject design refinements (i.e., the intersection improvements at Sepulveda Boulevard/96th Street) would not result in any new or different environmental impacts than those addressed in the Draft EIR.

The Non-CEQA Transportation Assessment Report is available at https://www.lawa.org/atmp/documents; however, as noted above, it does not pertain to the environmental impacts of the proposed Project and is entirely separate from the EIR for the proposed Project.

ATMP-AL008-4

Comment: • Study additional corridors and intersections outside of what was included in the supporting NOP documentation and the DEIR for the ATMP project. I'm happy to see that 16 additional intersections, including Lincoln & Sepulveda, are being studied as part of a non-CE QA analysis that the Department of Transportation (LADOT) is working on with LAWA.

Response: The comment is noted. Please see Topical Response TR-ATMP-T-1 regarding the assessment of transportation effects associated with the LAX Airfield and Terminal Modernization Project that are not subject to CEQA, which was conducted in accordance with the City of Los Angeles Transportation Assessment Guidelines.

ATMP-AL008-5

Comment: Also mentioned in my NOP comment letter to this project was the importance of Vehicle Miles Traveled (VMT). The use of this metric versus prior methods using Level of Service (LOS) opens up a new world of opportunities for mitigating this project's impacts on traffic and pollution affecting Westchester and Playa del Rey. VMT allows for targeted solutions to reduce the number of cars traveling to and from LAX, not just building more roadways to handle more cars. As formal mitigations are agreed upon, I am seeking

robust mitigations to reduce VMT for both employees and passengers. LAX should directly address the traffic it creates by:

• Reducing fares for FlyAway and public transportation serving the airport. Building on the success of prior transit fare reductions LAWA implemented during peak holiday travel days pre-COVID, additional thresholds of fare reductions need to be automatically implemented if/when VMT targets are not met.

Response: Please see Topical Response TR-ATMP-T-2 regarding VMT mitigation measures and monitoring for the LAX Airfield and Terminal Modernization Project. As indicated therein, MM-T (ATMP)-1, VMT Reduction Program, in the Draft EIR describes the list of potential VMT reduction strategies currently available for reducing VMT impacts associated with the proposed Project. The identified list of VMT mitigation reduction strategies is not intended to limit future VMT reduction strategies solely to those presented in the Draft EIR; if other feasible VMT reduction strategies are identified in the future and are necessary to reduce VMT impacts below the level of significance as indicated through mitigation monitoring, they too may be implemented. Please also see Table 1 in Topical Response TR-ATMP-T-2 which specifically addresses the suggestion to reduce fares for FlyAway and transit service to LAX.

ATMP-AL008-6

Comment: • Improving transit attractiveness and reliability by working with Metro and municipal operators to increase bus and train frequency so that more people will choose public transit versus private cars, thus reducing VMT. LAWA should work with transit operators to ensure that service patterns provide sufficient capacity for airport-related travel.

Response: Please see Topical Response TR-ATMP-T-2 regarding VMT mitigation measures and monitoring for the LAX Airfield and Terminal Modernization Project. As indicated therein, Metro has launched a pilot program around the airport that provides on-demand micro-transit service. Expanding beyond the pilot program into a full program with an increased service area is identified as a part of MM-T (ATMP)-1, VMT Reduction Program, in the Draft EIR.

ATMP-AL008-7

Comment: • Establishing curbside management policies and/or CTA access policies that encourage drivers to pick up and drop off LAX air passengers at points outside of the CTA along the LAMP Automated People Mover to be opened in approximately 2 years.

Response: Please see Topical Response TR-ATMP-T-2 regarding VMT mitigation measures and monitoring for the LAX Airfield and Terminal Modernization Project. As indicated therein, MM-T (ATMP)-1, VMT Reduction Program, in the Draft EIR describes the list of potential VMT reduction strategies currently available for reducing VMT impacts associated with the proposed Project. Specific to your request to establish curbside management and CTA access policies to reduce activity in the CTA, the LAX Landside

Access Modernization Program has already committed to providing pick-up and drop-off options outside of the CTA by way of the new intermodal transportation facilities (ITFs) and the Airport Metro Connector, all of which have access to the new LAX automated people mover (APM) system nearby.

ATMP-AL008-8

Comment: • Building additional bus-only lanes to feed into the CTA and the LAMP project area to prioritize high-occupancy transit, separating buses from car traffic, reducing congestion and air pollution, and improving the speed and reliability of better transit options serving LAX.

Response: Please see Topical Response TR-ATMP-T-2 regarding VMT mitigation measures and monitoring for the LAX Airfield and Terminal Modernization Project. Please see, in particular, Table 1 in the topical response, which specifically addresses the suggestion to build additional bus-only lanes that feed into the Central Terminal Area (CTA) and the LAX Landside Access Modernization Program area.

ATMP-AL008-9

Comment: • Expanding the coverage area and scope of the Transportation Management Organization (TMO) that we are working together to establish to include not just airport properties, but nearby office buildings in Westchester, Playa Del Rey, and El Segundo. Such an expansion is crucial to mitigate cumulative VMT growth in the airport vicinity. LAX and nearby supporting businesses and offices represent approximately 50,000 jobs. Employees need more sustainable, cost-effective, and reliable daily transportation options that are competitive and more attractive than driving to work. This would go a long way in ensuring that local neighbors receive much needed relief from LAX-bound traffic.

Response: Please see Topical Response TR-ATMP-T-2 regarding VMT mitigation measures and monitoring for the LAX Airfield and Terminal Modernization Project. Please see, in particular, Table 1 in the topical response, which specifically addresses the suggestion for expanding the coverage area and scope of the Transportation Management Organization.

ATMP-AL008-10

Comment: Data drives accountability, and so we need a robust mitigation monitoring and reporting program (MMRP) for employee and passenger VMT. While passenger air traffic is expected to continue growing at LAX, growth in vehicle traffic is not inevitable. LAWA should embrace and institutionalize an ongoing commitment to tracking and reporting traffic and transportation data. Once airport modernization is complete, there is no future date at which point it won't be necessary to manage landside operations. LAWA's

commitment to monitor and manage traffic to the airport should continue through the operational life of the project, not a set date after construction is complete.

Response: Please see Topical Response TR-ATMP-T-2 regarding VMT mitigation measures and monitoring for the LAX Airfield and Terminal Modernization Project. LAWA's commitment to monitor and manage traffic at LAX has been ongoing for several decades and is anticipated to continue into the foreseeable future. LAWA agrees with you regarding the importance of a robust mitigation monitoring and reporting program. As stated on page 4.8-57 of the Draft EIR, monitoring and reporting of the effectiveness of the employee VMT reduction strategies would be done annually until the target is reached for three consecutive years. LAWA has subsequently revised the Draft EIR to extend that period to five years of sustained VMT reduction (see Topical Response TR-ATMP-T-2 and Chapter F3, Corrections and Clarifications to the Draft EIR). The requirement for monitoring to show that the target is met for five consecutive years and the removal of a monitoring requirement is consistent with the draft update to the City's TDM Ordinance that was released in June 2021. Monitoring of passenger VMT and induced travel VMT is considered infeasible and those impacts were found to be significant and unavoidable.

ATMP-AL008-11

Comment: Good data drives good decisions. LAWA regularly monitors the numbers of vehicles that enter into the CTA. This monitoring should be expanded to include the Sepulveda & Century Boulevard corridors and pickup and drop-off points in LAMP (ITF West, Metro AMC, Con RAC). Capturing this data and making it publicly available will allow LAWA, the City of Los Angeles, the Department of Transportation (LADOT), Metropolitan Transportation Authority (LA Metro), and others to have the tools they need to invest in the future of mobility to and from the world's 4th busiest airport.

Response: You are correct in noting that LAWA regularly monitors the numbers of vehicles that enter into the CTA. The ability to monitor CTA traffic based on the fact that data collection is on roadways owned and operated by LAWA, and that all of the traffic on those roads is airport-related. That would not be the case in monitoring traffic along the Sepulveda Boulevard and Century Boulevard corridors which are under the jurisdictions of Caltrans, the City of Los Angeles and the City of Inglewood, respectively, and traffic operating on those corridors includes both airport-related traffic and non-airport traffic. LAWA will implement a monitoring program at pick-up and drop-off points at the facilities being developed under the LAX Landside Access Modernization Program.

ATMP-AL008-12

Comment: Though traffic and transportation are areas of special focus for me and my constituents, I have one additional suggestion that reflects guidance from the Los Angeles Department of City Planning and the Bureau of Engineering that I would like to see amended in the Final EIR language for this project.

In Chapter 2 of the Draft EIR page 2-85 in the Entitlements Section the text currently reads:

The proposed Project components are consistent with the City of Los Angeles General Plan, including the LAX Plan and the Westchester-Playa de/ Rey Community Plan, and LAX Specific Plan zoning regulations. Therefore, no plan amendments or discretionary zoning actions are required to permit development of the proposed airside, landside, or terminal improvements. Additionally, some of the landside improvements would require approval to effect public street vacations and public street easements. LAWA would be required to satisfy specific conditions tied to these public street approvals, including but not limited to, the construction of curbs, gutters, sidewalks, and stormwater drainage.

To more fully capture investments needed for high-quality public space in the LAX area, I request that the last sentence referenced above instead read:

LAWA would be required to satisfy specific conditions tied to these public street approvals, including but not limited to, the construction and repair of roadways, curbs, gutters, sidewalks, irrigation, stormwater drainage, landscaping, street trees, street furniture, street lighting, transit shelters, wayfinding signage, and utility relocations.

Response: Design and implementation of the proposed Project would satisfy all City requirements, including conditions pertaining to public street vacations and public street easements. LAWA would work closely with the relevant City departments during the design process to secure the necessary permits and to meet all applicable conditions.

ATMP-AL008-13

Comment: The ATMP project comes at a pivotal time for LAWA and the community. Though we can see very visible and hopeful signs that point to a better connected, more sustainable LAX, we still need to do more .. Though ATMP would provide tangible benefits to the community via roadway and air safety improvements, it must also include new investments into the way LAWA monitors and reduces traffic, while ensuring better public space reflective of a more sustainable future.

We must continue living by the spirit of the agreement that was reached with airport neighbors, never forgetting that modernization must happen in partnership with the local community and that LAX is an integral part of that community. I ask for this level of thoughtfulness and diligence from LAWA in order to fulfill our promise of delivering a world-class airport that is also a first-class neighbor, and I am ready to work with you toward that purpose.

Response: The comment is noted and will be included in the Final EIR for consideration by the decision-makers prior to taking any action on the LAX Airfield and Terminal Modernization Project. Please see Topical Response TR-ATMP-T-1 and Response to Comment ATMP-AL008-1 regarding the evaluation of traffic and congestion in and around LAX. Please also see Response to Comment ATMP-AL008-1 regarding LAWA's

commitment to working with you and with the community during Project design and implementation.

ATMP-AL009	**Guerrero Jr., Edward**	**City of Los Angeles, Department of Transportation**	**3/15/2021**

ATMP-AL009-1

Comment: The City of Los Angeles Department of Transportation (LADOT) appreciates the opportunity to review the Draft Environmental Impact Report, dated October 2020, for the LAX Airfield and Terminal Modernization Project (ATMP). As noted in the project description, in addition to airfield improvements, the Project consists of the following key components that were the focus of LADOT's review:

● New Terminal Facilities: includes the construction of Concourse 0 as a new easterly extension of Terminal 1 and the construction of Terminal 9, a new passenger terminal located southeast of the intersection of Sepulveda Boulevard and Century Boulevard.

● Roadway Improvements: comprised of approximately 5.8 lane miles of new arrival and departure roadways and a parking facility to support Terminal 9, an additional station on the previously approved LAX Automated People Mover (APM) line with a pedestrian connection to Terminal 9, and a pedestrian corridor between Terminal 8 and 9 that would bridge across Sepulveda Boulevard.

Pursuant to Senate Bill (SB) 743 and the recent changes to Section 15064.3 of the State's California Environmental Quality Act (CEQA) Guidelines, the City of Los Angeles adopted vehicle miles traveled (VMT) as the criteria to determine transportation impacts under CEQA. The transportation analysis in the ATMP DEIR appropriately applies VMT thresholds in assessing the project's transportation impacts. The report notes that potential traffic impacts are based on an assessment of future (2028) conditions both with and without implementation of the project. When estimating daily airport trip generation, the proposed Project is expected to result in new daily vehicle trip activity for approximately 4,700 new employees that would serve the Concourse 0 and Terminal 9 facilities.

The proposed roadway system includes dedicated LAX ramps and roadways that are expected to redirect airport-related queuing away from the adjacent local arterials and onto the new airport ramp system. LADOT agrees that these roadway improvements and the added storage they offer should help reduce congestion and delays on local arterials including Sepulveda Boulevard and Century Boulevard.

When the Los Angeles City Council adopted the VMT thresholds used for CEQA analyses on July 30, 2019, they also approved the new LADOT Transportation Assessment Guidelines (TAG). In addition to establishing the VMT impact methodology used to process a project's CEQA analysis, the LADOT TAG requires projects to verify consistency with the transportation and mobility objectives of adopted City plans (i.e., Mobility Plan 2035, Vision Zero Initiative, Plan for Healthy LA, etc.). Separate from the CEQA evaluation

of the proposed Project, LAWA staff is currently working with LADOT to complete an analysis of the local access and circulation for all users of the transportation system, and is committed to implement improvements identified in this separate analysis.

Response: LAWA thanks the City of Los Angeles Department of Transportation (LADOT) for its review of the Draft EIR. The comment accurately summarizes the proposed Project and the methodology used for the transportation analysis included in Section 4.8 of the Draft EIR. Responses to LADOT's subsequent comments are provided below.

ATMP-AL009-2

Comment: TRANSPORTATION IMPACT ANALYSIS

As noted in Section 4.8.4 of the DEIR, the proposed Project is a unique land use for which the LADOT VMT estimation tools and thresholds created for traditional land uses (office or residential projects) do not apply; therefore, specific project impact thresholds were developed in accordance with State guidance, and were based on close coordination between LAWA and LADOT. The thresholds developed for the Project analysis focus on three types of VMT created by the proposed Project: (1) VMT per employee; (2) net change in total passenger VMT and; (3) short-term and long-term induced VMT. A significant transportation impact would occur if the proposed Project would:

1. Generate a VMT per employee that exceeds 15 percent below the VMT per employee for the projected Future Baseline 2028 conditions

2. Increase total passenger VMT over the passenger VMT of the projected Future Baseline 2028 conditions

3. Induce substantial additional VMT compared to the VMT of the projected Future Baseline 2028 conditions

As noted in the DEIR Table 4.8.16 (Summary of Impacts and Mitigation Measures), the project would exceed each of these thresholds and would, therefore, result in a significant transportation impact. To address these impacts, the project proposes to implement a VMT Reduction Program, consisting of various transportation demand management strategies with a monitoring and reporting program to verify the VMT reduction benefits of the VMT Reduction Program. However, should full mitigation not be achieved, then the identified impacts would remain significant and unavoidable.

With the upcoming completion of the consolidated Rental Car Facility, the LAX Automated People Mover system, the LAX intermodal transportation facilities, and the Metro LAX/Crenshaw Light Rail Transit line - all expected before 2028, travel behavior and commuter mode shares are expected to be significantly different (compared to current travel patterns) in and around LAX by 2028. Therefore, the baseline scenario used to determine the project transportation impacts compares the 2028 "with project" conditions against the 2028 "without project" conditions, to account for the aforementioned transportation system improvements that are expected to be present

when the project becomes operational. The transportation impact analysis and the VMT thresholds established for this project are consistent with State guidance and the changes to CEQA related to Senate Bill 743.

Response: The comment accurately summarizes the methodology and results of the transportation analysis included in Section 4.8 of the Draft EIR.

ATMP-AL009-3

Comment: COMMENTS / RECOMMENDATIONS

LADOT offers the following comments and recommendations on the transportation section of the ATMP DEIR:

VMT Reduction Program
As noted in the DEIR Table 4.8.16 (Summary of Impacts and Mitigation Measures), the project would exceed each of the impact thresholds identified for the project. To address the project's transportation impacts, the project proposes to implement a VMT Reduction Program consisting of, at a minimum, the following VMT reduction strategies:

- Expand LAWA's Rideshare Program
- Formalize Employee Telecommuting Program
- Provide On-demand Micro Transit Shuttle Program
- Market and Promote Alternative Transportation Options

The analysis anticipates that implementation of these strategies would be sufficient to reduce the airport-wide employment VMT by more than 16,450 daily VMT and fully mitigate the employee VMT impact.

The report also identifies the strategies listed below for evaluation and future consideration in a VMT reduction program:

- Conduct Parking Study to Price Parking to Reduce VMT
- Expand Incentives and Commuter Benefits
- Evaluate Modifications to FlyAway Service
- Explore Incentive Measures from LAWA Mobility Strategic Plan
- Evaluate the Potential for Congestion Pricing in the CTA

In evaluating potential future modifications to the FlyAway program, LADOT recommends that LAWA consider expanding the geographic reach of the service and explore incentives that can increase ridership.

Response: The comment is noted and is consistent with information presented in Section 4.8 of the Draft EIR regarding transportation impacts and mitigation measures. The specific recommendation by the commenter to expand the geographic reach of FlyAway service that can increase ridership is included in the Draft EIR on page 4.8-55, which states:

- Evaluate Modifications to FlyAway Service – In conjunction with renewing the contract for the provision of the FlyAway bus service, LAWA shall evaluate the potential to reach new geographical areas where potential ridership would support establishment of a route to such areas and will implement such routes if determined feasible.

Additional information regarding this proposal is presented in Topical Response TR-ATMP-T-2.

ATMP-AL009-4

Comment: It is also recommended that LAWA collaborate with LADOT during the project construction phase to develop a VMT reduction program that, in addition to the strategies listed above, consider, but not be limited to, the following strategies:

Response: LAWA has been collaborating with LADOT since the initial stages of the LAX Airfield and Terminal Modernization Project and will continue close collaboration as more detailed planning for the Project progresses further. The comment includes an introduction to several specific VMT reduction measures that are presented in Comments ATMP-AL009-5 through ATMP-AL009-9. As indicated in the responses to those comments, Topical Response TR-ATMP-T-2, regarding vehicle miles traveled (VMT) mitigation measures and monitoring for the LAX Airfield and Terminal Modernization Project, addresses the additional VMT reduction strategies recommended by the commenter.

ATMP-AL009-5

Comment: ● Transit system enhancements - collaborate with Metro, LADOT, and other transit service providers to identify areas of bus service improvements that increase the reliability and reduce travel times of public transit routes that connect to LAX and adjacent areas.

Response: Please see Topical Response TR-ATMP-T-2 regarding VMT mitigation measures and monitoring for the LAX Airfield and Terminal Modernization Project and, in particular, Table 1 in the topical response, which addresses the additional VMT reduction strategies requested by the commenter. Section 4.8.5.2 of the Draft EIR discusses the VMT employee impact and references both on-demand micro-transit along with the marketing and promotion of alternative transportation options (such as transit) to reduce VMT. These mitigation measures are also applicable to the passenger VMT impact as referenced in Section 4.8.5.3 of the Draft EIR.

ATMP-AL009-6

Comment: ● Evaluate potential curbside management strategies.

Response: Please see Topical Response TR-ATMP-T-2 regarding VMT mitigation measures and monitoring for the LAX Airfield and Terminal Modernization Project and, in particular, Table 1 in the topical response, which addresses the additional VMT reduction strategies requested by the commenter.

ATMP-AL009-7

Comment: ● Consider evolving enhancements in transportation technology and their ability to reduce LAX-related vehicle trips and VMT.

Response: Please see Topical Response TR-ATMP-T-2 regarding VMT mitigation measures and monitoring for the LAX Airfield and Terminal Modernization Project and, in particular, Table 1 in the topical response, which addresses the additional VMT reduction strategies requested by the commenter. The mitigation program consists of a number of measures and is likely to evolve over time as new data and technologies are developed.

ATMP-AL009-8

Comment: ● Explore the expansion of the LAX Transportation Management Organization service area.

Response: Please see Topical Response TR-ATMP-T-2 regarding VMT mitigation measures and monitoring for the LAX Airfield and Terminal Modernization Project. Please see, in particular, Table 1 in the topical response, which addresses the commenter's suggestion for expanding the service area for the LAX Transportation Management Organization.

ATMP-AL009-9

Comment: ● Explore the use of big data and digital platforms to better understand trip making behaviors related to LAX and tailor specific strategies accordingly.

Response: Please see Topical Response TR-ATMP-T-2 regarding VMT mitigation measures and monitoring for the LAX Airfield and Terminal Modernization Project. In particular, Table 1 in the topical response notes that LAWA has already started to implement new technologies, including several on digital platforms, as part of its Ground Transportation Management System, such as the Mobility Data Specification Platform (MDS). MDS will enable comprehensive and standardized two-way digital communications between LAWA and commercial fleet companies operating at LAX. Additionally, LAWA is currently preparing a Request for Proposals (RFP) for a new FlyAway service contract that will include consideration and incorporation of emerging technologies such as a technology

platform that provides booking, payment and real time arrival information as well as a back-end data dashboard that provides dynamic updates on FlyAway operations.

ATMP-AL009-10

Comment: Successful transportation demand management programs are outcome-driven, and have a list of strategies to draw from to achieve the stated outcomes. Such programs are also dynamic with the ability to consider new measures throughout the life of the program or enhancements to existing strategies, after measuring the effectiveness of the program and its strategies.

Response: The comment is noted and is consistent with the intent of MM-T (ATMP)-1 in the Draft EIR. Please see Topical Response TR-ATMP-T-2 regarding vehicle miles traveled (VMT) mitigation measures and monitoring for the LAX Airfield and Terminal Modernization Project.

As indicated therein, the actual effectiveness of the VMT reduction strategies selected for implementation would be validated through annual monitoring and reporting. Furthermore, if other feasible VMT reduction strategies are identified in the future and are necessary to reduce VMT impacts below the level of significance as indicated through mitigation monitoring, they, too, may be implemented.

ATMP-AL009-11

Comment: Annual Monitoring and Reporting
In conjunction with the implementation of VMT reduction strategies, LAWA proposes to implement an annual monitoring and reporting process to measure LAX employee VMT each year and to evaluate any noted benefits of the VMT reduction strategies. LADOT agrees that monitoring is a key element to any successful program aimed at reducing vehicle trips and VMT, and recommends that LAWA also include passenger VMT in the annual monitoring program. These reports can inform if additional measures should be implemented by LAWA to achieve desired travel behavior outcomes. As described above, if the program's outcomes are not achieved, then existing strategies should be expanded and/or new strategies should be considered.

To verify VMT reduction achievement, the project proposes to implement an annual monitoring program to report on the effectiveness of the VMT reduction strategies, beginning upon initial operation of Concourse 0 or Terminal 9. The project proposes to eliminate this VMT monitoring requirement once the VMT per employee performance goal of 20.4 or VMT equivalent is achieved for three consecutive years. However, as previously discussed, LADOT recommends that passenger VMT also be monitored, and, to ensure that VMT reduction is retained long term, it is recommended that the monitoring program be conducted over a longer term (at least five years) of successfully achieving the desired outcomes. This would help ensure that VMT reduction strategies perform in a consistent manner that can translate to long term success.

LAWA should work with LADOT to develop a VMT Reduction Monitoring and Reporting Plan to formalize desired outcomes, to summarize the potential list of strategies, to establish a reporting schedule, and to develop monitoring procedures and protocols. As stated above, it is recommended that LAWA collaborate with LADOT to develop this plan post-project approval and during the early phases of the project's construction phase.

Response: The commenter is describing the annual monitoring and reporting that will be conducted by LAWA to validate the level of LAX employee VMT reduction attained each year. Please see Topical Response TR-ATMP-T-2 regarding VMT mitigation measures and monitoring for the LAX Airfield and Terminal Modernization Project. It should be noted that LAWA has revised the Draft EIR to extend the VMT monitoring program recommended as part of the mitigation from at least three consecutive years of compliance to five consecutive years of compliance. Please see Chapter F3, Corrections and Clarifications to the Draft EIR.

ATMP-AL009-12

Comment: CONCLUSION
The transportation analysis in the project DEIR appropriately applies VMT thresholds in assessing the project's transportation impacts that are consistent with both Senate Bill 743 and City guidance. The assumptions and methodology of the analysis are also consistent with LADOT's Transportation Assessment Guidelines.

LADOT agrees with the project's recommended approach to monitor and report project-related travel patterns and VMT. It is unclear if, and when, regional travel patterns and airport activity will be restored following the COVID-19 pandemic. The infrastructure improvements planned and under construction in and around LAX are also expected to collectively alter travel behavior, reduce vehicle trips within the CTA, and increase the transit mode share of LAX-related traffic. Nonetheless, the transportation analysis in the project DEIR conservatively assumes that airport activity will be at the levels predicted before the pandemic by the project buildout year of 2028, so a monitoring approach is suitable to measure actual activity levels and travel behavior, and address those patterns with VMT reduction strategies accordingly.

LADOT appreciates LAWA's continued efforts to pursue projects, like the creation of the Transportation Management Organization, enhancing the FlyAway program, and implementing the strategies identified in the LAX Mobility Strategic Plan. If successfully implemented, these programs can collectively reduce vehicle travel to LAX, increase the mode share of vanpooling and transit use, and reduce greenhouse gas emissions and congestion in the local street system surrounding LAX.

Response: The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the ATMP project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the ATMP Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

ATMP-AL010	**Petta, Joseph "Seph"**	**Shute, Mihaly & Weinberger LLP, on behalf of City of El Segundo**	**3/15/2021**

ATMP-AL010-1

Comment: Please accept the following comments on the Los Angeles World Airports ("LAWA") Draft Environmental Impact Report ("DEIR") for the Los Angeles International Airport ("LAX") Airfield and Terminal Modernization Project (hereafter, "Project" or "ATMP"). These comments are submitted on behalf of our client, the City of El Segundo ("El Segundo"). They consist of this letter, the attached reports ("Attachments") prepared by expert technical consultants who have provided specialized analysis of certain areas of particular concern, and numerous Exhibits which are bound separately.[1] The Attachments and Exhibits submitted herewith provide additional relevant materials which should be carefully considered by you and the decisionmakers before taking any action on the proposed Project.

[1] This letter, along with the February 8, 2021 report by Adib Kanifani, Ph.D, N.A.E. (Attachment A hereto, hereafter the "Kanafani Report"); the January 7, 2021 report by Fred M. Svinth, INCE, Assoc. AIA with Illingworth & Rodkin, Inc. (Attachment B hereto, hereafter the "Svinth Report"); the January 14, 2021 report by Neal Liddicoat, P.E., with Griffin Cove Transportation Consulting (Attachment C hereto, hereafter the "Liddicoat Report"); and the January 21, 2021 report by Todd Tamura, QEP, with Tamura Environmental (Attachment D hereto, hereafter the "Tamura Report"), constitute the City of El Segundo's comments on the DEIR. We respectfully request that the Final EIR respond separately to each of the points raised in the technical consultants' reports as well as to the points raised in this letter.

Response: LAWA thanks the City of El Segundo for its review of the Draft EIR. Please see Responses to Comments ATMP-AL010-2 through ATMP-AL010-201 which address comments in the March 15, 2021 letter from Shute, Mihaly & Weinberger LLP on behalf of the City of El Segundo. Responses to comments included in the attachments have also been provided and are identified as follows: Attachment A - February 8, 2021 report by Adib Kanifani, Ph.D, N.A.E. (Responses to Comments ATMP-AL010-202 through ATMP-AL010-210); Attachment B - January 7, 2021 report by Fred M. Svinth, INCE, Assoc., AIA, with Illingworth & Rodkin, Inc. (Responses to Comments ATMP-AL010-211 through ATMP-AL010-224); Attachment C - January 14, 2021 report by Neal Liddicoat, P.E., with Griffin Cove Transportation Consulting (ATMP-AL010-225 through ATMP-AL010-277); and Attachment D - January 21, 2021 report by Todd Tamura, QEP, with Tamura Environmental (ATMP-AL010-278 through ATMP-AL010 309). In addition, responses to comments contained in the December 23, 2019 letter from Shute, Mihaly & Weinberger LLP to Evelyn Quintanilla, Chief of Airport Planning II, Los Angeles World Airports, included as Exhibit 4 of the March 15, 2021 comment letter and incorporated by reference therein, are provided in Responses to Comments ATMP-AL010-310 through ATMP-AL010-318.

The comments from the City of El Segundo will be included in the Final EIR for consideration by the decision-makers prior to taking any action on the LAX Airfield and Terminal Modernization Project.

ATMP-AL010-2

Comment: The ATMP will add a new Terminal 9 and a new Concourse 0, together containing up to twenty-nine new "contact" gates for passenger loading. These new facilities would create substantial noise, transportation, and air pollution impacts affecting El Segundo residents, who already deal with the impacts from one of the busiest airports in the world.

Response: As described in Section 2.4.2 of the Draft EIR, the proposed Project would add nine (9) net new gates at Concourse 0 (two existing gates at Terminal 1 would be removed as a result of the proposed Project) and up to 18 gates at Terminal 9, for a total of up to 27 new contact gates, not 29 new gates as stated by the commenter. Impacts associated with noise, transportation, and air quality are addressed in Sections 4.7, 4.8, and 4.1.1 of the Draft EIR, respectively. Although the proposed Project may result in temporary increases in aircraft noise for several months in 2023 and in 2024, as demonstrated in Section 4.7.1, the proposed Project would not have any significant long-term operational aircraft noise impacts on residents in El Segundo. Similarly, as demonstrated in Sections 4.7.2 and 4.7.3, the proposed Project would not have any significant roadway or construction noise impacts to residents in El Segundo. The analysis of transportation impacts focuses on vehicle miles traveled (VMT), which is not a geographically-specific metric. With respect to air quality impacts, air pollutant emissions are measured as mass emissions and are also not geographically specific. However, as shown in Figures 4.1.1-2 and 4.1.1-3 of the Draft EIR, no exceedances of the South Coast Air Quality Management District's significance thresholds for air pollutant concentrations would occur in El Segundo.

ATMP-AL010-3

Comment: The DEIR also includes a variety of safety and "efficiency" improvements on the north and south airfields, including lengthened and reconfigured taxiways. Despite these airfield improvements, the Project does not provide for the lengthening of any north airfield runways or further separate the current runways on the north side. Thus, the Project would exacerbate the existing operations imbalance between the north and south airfields, which places the impacts of the bulk of operations—involving the largest, heaviest, noisiest, and dirtiest aircraft—on El Segundo's residents, thereby sparing City of Los Angeles residents such impacts.

Response: As stated on page 1-4 in Section 1.1.3 of the Draft EIR, the objective of the LAX Airfield and Terminal Modernization Project airfield improvements is to "[e]nhance the safety and operational management of the LAX airfield while working within the limits of the existing 4-runway system (i.e., do not add or relocate runways)." As such, the proposed Project focuses on improvements that do not require physically altering LAX's existing runways.

The commenter asserts, without supporting documentation, that the proposed Project would worsen an existing imbalance between north and south airfield operations

because it does not physically alter either of the north airfield runways. However, Table 4.6-5 of the Draft EIR summarizes how the proposed improvements to the north airfield would contribute towards a balanced airfield by improving operational efficiency through enhancing safety, better supporting the fleet operating at LAX, and providing operational flexibility. Specific details regarding the operational benefits of the airfield elements are described in Section 2.4.1 and Appendix B.2 of the Draft EIR. Please also see Response to Comment ATMP-AL010-17 regarding balance between the north and south airfields.

Aircraft noise impacts associated with the proposed Project are evaluated in Section 4.7.1 of the Draft EIR and air quality impacts are addressed in Section 4.1.1. These analyses disclose all impacts associated with forecasted aircraft operations and runway utilization with implementation of the proposed Project.

ATMP-AL010-4

Comment: The Project also includes major roadway demolition and reconstruction, including a consolidation of eastern access to the Central Terminal Area ("CTA") from Century Boulevard, and direct vehicle access to the proposed Terminal 9 curbside area from Sepulveda Boulevard. Considered together with ongoing construction from other current and future LAX projects, the ATMP would subject residents of El Segundo and nearby communities to nearly a decade of intense construction activity.

Response: The comment is noted and will be included in the Final EIR for consideration by the decision-makers prior to taking any action on the LAX Airfield and Terminal Modernization Project. Both Project-related and cumulative impacts of the proposed Project, including Project-related and cumulative impacts from construction activities, are addressed throughout the individual subsections in Chapter 4 of the Draft EIR. Additionally, the Draft EIR includes multiple mitigation measures (including a Construction Noise Control Plan, Construction Scheduling, and Construction Mitigation Oversight, as well as construction-related air quality measures) to minimize construction impacts. (See, e.g., Section 4.7.3 and Section 4.1.1 of the Draft EIR.) Please also see Responses to Comments ATMP-AL010-72, ATMP-AL010-133, and ATMP-AL010-134 for additional discussion of construction-related impacts.

ATMP-AL010-5

Comment: In addition, the expansion would exacerbate a growing problem of travelers and LAX workers using and parking on El Segundo streets.

Response: The issue of concern in this comment is similar to that in comment ATMP-PC010-4; please see Response to Comment ATMP-PC010-4. In addition to the measures being taken by LAWA to address airport-related parking in nearby communities, as described in that response to comment, it should be noted that it is within the City of El Segundo's jurisdictional authority to institute parking restrictions, such as 2-hour maximum parking

or residential permit parking, to address this concern. LAWA does not have authority to institute such parking restrictions in the City of El Segundo.

ATMP-AL010-6

Comment: This letter explains the legal inadequacies of the DEIR under the California Environmental Quality Act ("CEQA"), Public Resources Code section 21000 et seq. As we explain below, the DEIR is woefully deficient in numerous respects, and must be substantially revised and recirculated before decisionmakers can consider the Project.[2]

[2] We appreciate that LAWA responded to El Segundo's request for an extension of the 45-day deadline for public comment on the DEIR, ultimately extending the comment due date to March 15, 2021 from December 14, 2020. LAWA unnecessarily made the process of commenting on the DEIR more difficult, however, by rejecting El Segundo's request for an "unlocked" copy of the DEIR such that text may be copied and pasted into commenters' written comments. LAWA's "policy" not to unlock EIRs that are circulated for public comment makes the public's right to comment more difficult, particularly when dealing with a document of this DEIR's size and density.

Response: The comment is noted and will be included in the Final EIR for consideration by the decision-makers prior to taking any action on the LAX Airfield and Terminal Modernization Project. Responses to the specific comments contained in this letter are provided in Responses to Comments ATMP-AL010-8 through ATMP-AL010-318 below. In preparing the Final EIR for the proposed Project, LAWA has reviewed all of the comments received, and has carefully considered the responses to these comments and other information provided in the LAX Airfield and Terminal Modernization Project Final EIR. None of the information provided in the Final EIR meets the criteria for recirculation of an EIR as outlined in Section 15088.5 of the State CEQA Guidelines.

With regards to the comments pertaining to the format of the electronic version of the LAX Airfield and Terminal Modernization Project Draft EIR, CEQA does not require a lead agency to provide electronic files whose text can be copied and pasted. LAWA's policy is to ensure that documents distributed to the public on LAWA's website are secured so that the text cannot be tampered with. This approach in no way limits the availability or accessibility of documents posted to LAWA's website. LAWA believes its approach represents a reasonable balance between ensuring that documents are available and guaranteeing the integrity of those documents. As noted in newspaper notices and in the Notice of Availability of the Draft EIR, which was distributed to thousands of agencies, stakeholders, and members of the public – including the commenter – LAWA offered to make the Draft EIR available in other formats (large print, braille, audio, other formats) upon request.

ATMP-AL010-7

Comment: It is important to note that El Segundo is mindful of the fact that it entered into a 2017 settlement agreement with LAWA regarding the LAX Landside Access Modernization Program ("LAMP"). That settlement includes, in relevant part, an agreement by El Segundo not to challenge the LAMP. Both El Segundo and LAWA have lived up to their obligations under the LAMP settlement and the LAMP is currently under construction. Complicating matters, however, is the fact that LAWA has now, as part of the ATMP, proposed various changes to the LAMP. As described in this letter, some of those LAMP changes are concerning to El Segundo. Per the 2017 settlement, El Segundo has not challenged, and would not challenge LAWA's implementation of LAMP as originally approved and as clearly described in the 2017 settlement agreement. The 2017 settlement does not, however, preclude El Segundo from challenging the changes to LAMP that LAWA is now proposing as part of the ATMP.

Response: The comments pertaining to the 2017 settlement agreement entered into by the City of El Segundo and LAWA, including the comment that the 2017 agreement does not preclude El Segundo from challenging the LAX Airfield and Terminal Modernization Project, are noted. These comments will be included in the Final EIR for consideration by the decision-makers prior to taking any action on the LAX Airfield and Terminal Modernization Project. Because these comments do not raise significant environmental issues, no further response is required. Responses to the commenter's concerns regarding the proposed Project's changes to the LAX Landside Access Modernization Program roadway system are provided in Responses to Comments ATMP-AL010-13 (which also addresses the comments raised in Comment ATMP-AL010-225), ATMP-AL010-108, ATMP-AL010-109, ATMP-AL010-148, and ATMP-AL010-227 below.

ATMP-AL010-8

Comment: I. The DEIR's Project Description Is Legally Inadequate.

A. The Project Is Not Necessary to Achieve LAWA's Stated Objectives.

The DEIR states that the "underlying" Project objectives are to "support the ongoing modernization of LAX, to provide excellent passenger service, to support the economic growth and prosperity of the Los Angeles region;" "to work closely with neighboring communities to reduce airport-related impacts;" "to prepare early for [] continued aviation growth . . . over the next several decades;" and to support "Los Angeles' plans to host the 2028 Olympic and Paralympic Games." DEIR at p. 2-18. The DEIR also lists several more "specific" objectives, including to "enhance airfield operational management" and "flexibility for management of aircraft movements on the airfield;" to "[p]rovide for new modern, spacious, and efficient terminal facilities that support the ability to accommodate the projected future growth in passenger levels . . . in a manner that offers . . . operational flexibility;" and to "reduce concentration of traffic and roadway facilities at and around the Century Boulevard/Sepulveda Boulevard/CTA interchange area." Id. at pp. 2-18 and 2-19. Yet, the DEIR does not explain why this particular Project, with its enormous scale and impact on the surrounding communities,

is the best way or even necessary to achieve these objectives. See also Part IV (discussing Project alternatives).

As discussed in detail later in this letter, LAWA's own statements throughout the DEIR that the Project would have no effect on LAX's passenger or operational capacity undermine the basic presumption of the DEIR that the Project is necessary to achieve LAWA's stated objectives. The DEIR repeatedly claims that the Project would have no growth effect on the passenger capacity of LAX because specific, quantified future "passenger activity . . . is anticipated to be realized with or without the proposed Project because the ability to accommodate the future aviation demand projected for LAX is not dependent on any of the improvements associated with the proposed Project." DEIR at p. 6-5; see generally DEIR, Appendix B.1. If such statements and analysis are to be believed, then this is not the right Project to "support the ability to accommodate the projected futured growth in passenger levels." DEIR at p. 2-18. As we explain below, LAWA's assertions that the Project would not contribute to passenger growth are dubious and contradicted by LAWA's own evidence.

Response: In accordance with Section 15124(b) of the State CEQA Guidelines, the Draft EIR includes a statement of the objectives sought by the proposed Project, which will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision-makers in preparing findings or a statement of overriding considerations, if necessary. The Draft EIR presents the Project objectives in Section 2.3 of Chapter 2, Description of the Proposed Project, and reiterates the Project objectives in Section 5.3 near the beginning of the Alternatives chapter (Chapter 5). CEQA does not require a Draft EIR to demonstrate that the proposed Project is "the best way" to achieve the project objectives. Per the aforementioned section of the State CEQA Guidelines, the objectives of the proposed Project were considered in, and helped guide, the formulation of a reasonable range of alternatives that were evaluated in the Draft EIR, and will aid in the preparation of findings and a statement of overriding considerations that will be prepared in accordance with Sections 15091 and 15093, respectively, of the State CEQA Guidelines. Findings and a statement of overriding considerations are separate from the Draft EIR and will be prepared in connection with the Board of Airport Commissioners' consideration of the proposed Project. Regarding the commenter's reference to Part IV (discussing Project alternatives) of their comment letter, please see Responses to Comments ATMP-AL010-59 through ATMP-AL010-65, which address the individual comments in that part of the comment letter.

The Draft EIR does indicate that the passenger activity levels at LAX in 2028, which is the buildout horizon year for the proposed Project, would be realized with or without implementation of the proposed Project, and that such future growth is not dependent on any of the improvements associated with the proposed Project. It is not clear what the commenter means by "this is not the right Project to 'support the ability to accommodate the projected future growth in passenger levels.'" As reflected in the Project objectives, the proposed improvements are intended and designed to enable LAX to better accommodate projected future growth, providing improved operational flexibility and a higher quality passenger service than would otherwise occur without the Project. The proposed Project also includes airfield improvements to taxiways and runway exits to improve the safety and operational management of the LAX airfield. For

additional information on LAWA's objectives for the proposed Project, please see Section 2.3 of the Draft EIR and Response to Comment ATMP-AL010-9.

Regarding the commenter's general reference to subsequent comments on passenger growth, please see Topical Response TR-ATMP-G-1, as related to the aviation demand forecast and future growth at LAX, and Responses to Comments ATMP-AL010-31 through ATMP-AL010-40, which address the specific allegations raised in Part II.B. of the comment letter.

ATMP-AL010-9

Comment: LAWA moreover states that a core aim of the Project is to accommodate travel, including by athletes and dignitaries, to/from Los Angeles for the 2028 Olympic and Paralympic Games ("2028 Olympics"). Id. But LAWA does not explain why its existing terminal facilities would not be more than adequate to accommodate these travelers, particularly in light of the DEIR's statement that "existed and planned terminal facilities [without the Project] would provide adequate processing facilities for all existing and planned passenger gates in FY 2028 and FY 2033." DEIR, Appendix B.1 at p. 4-6. Particularly since LAWA has already in recent years spent millions, if not billions of dollars upgrading, expanding and "modernizing" the existing CTA terminals, Tom Bradley International Terminal ("TBIT") and constructing the new Midfield Satellite Concourse ("MSC") in order "to ensure the ability of aging terminal facilities and passenger processors to accommodate demand for air travel" (id.), the DEIR fails to make the case that this Project, too, is necessary to achieve LAWA's stated objectives.[3]

[3] On November 24, 2020 (and by a follow-up letter on December 22) El Segundo submitted document requests to LAWA under the California Public Records Act ("PRA") for, among other things, records of communications between LAWA and airline operators "regarding the need for passenger gates at 'Concourse 0' . . . and 'Terminal 9' . . . including but not limited to for the purpose of serving demand related to the 2028 Olympics." See Exhibit 1, Nov. 24, 2020 California Public Records Act request from El Segundo to LAWA. El Segundo submitted additional document requests on February 1, 2021. See Exhibit 1. El Segundo reserves the right to supplement these comments if LAWA discloses more responsive public records after the comment deadline has passed.

Response: The Draft EIR does not state that accommodating travel to/from Los Angeles for the 2028 Olympic and Paralympic Games is a core aim of the Project. Rather, the underlying purpose of the proposed Project is to support the ongoing modernization of LAX; provide excellent passenger service; support the economic growth and prosperity of the Los Angeles Region; and work closely with neighboring communities to reduce airport-related impacts.

With respect to the 2028 Olympic and Paralympic Games, the Draft EIR states that "the nature and timing of improvements included in the proposed Project are integral to Los Angeles' plans to host the 2028 Olympic and Paralympic Games." Completion of proposed Project construction prior to the 2028 Olympic and Paralympic Games is

identified as an additional objective, following the primary objectives, which are related to the provision of airfield improvements, terminal improvements, and roadway system improvements. While the operational analysis prepared by LAWA's aviation experts for the proposed Project demonstrates that LAX could accommodate travel associated with the 2028 Olympic and Paralympic Games without the improvements associated with the proposed Project, the proposed improvements would enable LAX to operate better at that time and would provide a more pleasant experience for all, including those traveling to and from the Games. The same holds true relative to the objective of completing the proposed improvements prior to the 2028 Olympic and Paralympic Games, to avoid the inefficiencies and impacts to passenger experience if construction activities are underway at the time. LAWA has taken into consideration the fact that the 2028 Olympic and Paralympic Games are scheduled and approved to occur in Los Angeles in 2028, and has factored that into the timing of when the LAX Airfield and Terminal Modernization Project improvements need to be completed, which LAWA has control over.

As indicated in the description of the Project Objectives, presented in Sections 1.1.3 and 2.3 of the Draft EIR, the terminal improvements associated with the proposed Project would serve to provide for new modern, spacious, and efficient terminal facilities that support the ability to accommodate the projected future growth in passenger levels at LAX and do so in a manner that offers high-quality passenger service and operational flexibility. Specifically, the proposed terminal improvements seek to:

- Improve passenger experience, increase airlines' efficiency, and reduce busing activity on the airfield through the removal and replacement of most of the West Remote Gates and the elimination of the associated busing of passengers
- Improve international and domestic passenger processing capabilities
- Improve immigration and customs processes for international passengers arriving at LAX
- Provide additional connections to the previously-approved APM system currently under construction
- Provide connections to adjacent terminals that will allow passengers to move between terminals without having to go back through security screening

All of the above would enable LAX to better accommodate the 2028 Olympic and Paralympic Games, especially in comparison to the level of passenger service that would otherwise occur with increased reliance on the West Remote Gates if the Project were not implemented.

ATMP-AL010-10

Comment: B. The DEIR Demonstrates No Effort by LAWA to Understand the COVID-19 Pandemic's Effect on the Feasibility or Utility of the Project.

On April 4, 2019 LAWA released the Notice of Preparation ("NOP") for the ATMP, anticipating a release of the DEIR for public comment in the first quarter of 2020. See CEQA Public Scoping Meetings: April 2019 Fact Sheet (Old Version) at p. 3.[4] However, the DEIR was not released for comment until October 29, 2020, more than eight months

after the COVID-19 pandemic took hold in California. By this time, not only had demand for air travel experienced a severe, unprecedented decline, but it also was widely understood that that the road to full economic recovery and return to "business as usual" would be long, particularly in light of a months-long winter "surge" in COVID-19 transmission. Despite this knowledge and all of the uncertainty it represents regarding the future of air travel and continued viability of the pre-pandemic aviation industry, LAWA is proposing the identical Project that was described in the NOP.

In a "Preamble" to the DEIR, LAWA simply states that because "the severity and duration of the contraction in aviation activity resulting from the COVID-19 global pandemic are still unknown, . . . the long-term forecasts developed for the proposed Project and documented in this Report are still valid and relevant for the long-term planning purposes of the [ATMP] environmental analyses." See also DEIR at p. 6-4, fn. 5 ("While the pandemic has had a substantial effect on the aviation industry and air travel in general, it is too early (i.e., speculative) to assess the long-term consequences related to aviation forecasts."). Notably, the DEIR omits the facts that by April 2020, passenger traffic at LAX had fallen by 95%, "reaching levels not seen since the 1950s," and that although passenger traffic has been "climbing back slowly" by late January 2021 it was still down 74% compared to one year earlier (with international traffic down 83%). See Howard Fine, "New LAX Chief Erbacci Navigates Challenges from Covid, Construction", Los Angeles Business Journal, Dec. 14, 2020;[5] January 2021 LAWA Traffic Comparison (dated February 23, 2021).[6]

Thus, the DEIR does not even attempt to grapple with the obvious question of whether, in light of the potentially long-lasting impacts of the COVID-19 pandemic on passenger air travel, this Project will address or respond to what may be permanent, global changes to the aviation sector, both in terms of demand and how airports and airlines conduct business going forward. Professor Adib Kanafani, Ph.D., N.A.E., whose comments on the LAX ATMP DEIR are attached hereto as Attachment A, notes that

[LAWA's] forecasts were made prior to the onset of the current pandemic. While recovery in the aviation system is not unknown and recognized in the preamble to the DEIR, the long-term effects of this pandemic on the behavior of the aviation system and on the socioeconomic factors driving aviation demand are not well understood yet. Some of the changes being witnessed today in work habits, commerce and social activities may become long lasting if not permanent. These changes will likely alter the relation between factors such as GDP growth and air travel demand. Likewise, recent changes in airlines fleets, such as the accelerated retirement of very large aircraft will alter the relation between aircraft operations forecast and passenger traffic forecasts, and relation between airfield and landside operational capacities. These recent changes are not reflected in what is essentially a postpandemic forecast.

Kanafani Report at p. 1; see also Jaap Bouwer, Vik Krishnan, and Steve Saxon, "Will airline hubs recover from COVID-19?", McKinsey & Company, Nov. 5, 2020.[7]

Indeed, on December 10, 2020, more than a month after LAWA released this DEIR which explicitly disregards any "long-term consequences [of COVID-19] related to aviation forecasts," the Board of Airport Commissioners ("BOAC") approved a $50 million

contract for a "Principal Engineer/Architect" team to "advance the planning and design" of the ATMP within the context of an aviation sector which has been "dramatically impacted" by the COVID-19 pandemic. See Exhibit 2, BOAC Dec. 10, 2020 Agenda Item 14 Staff Report. In recommending contract approval, the BOAC staff report stated that "[t]his unique challenge has required LAWA to re-invent our processes, priorities, and the methodical allocation of our limited resources," such that the role of the Principal Engineer/Architect would be to "assist LAWA with complex airport planning decisions as we navigate through this transitional period." Id. LAWA's retention of a consulting team to advise on the ATMP through this "transitional period," only after releasing a lengthy DEIR for a multibillion dollar project fully envisioned before the pandemic, underscores LAWA's "shoot first, ask questions later" approach to this Project.

The DEIR also omits any consideration of whether it is still reasonable to assume that the Project would be completed and operating on the same schedule as LAWA anticipated at the time the NOP was released. This is an immense and complex Project, construction of which will likely be impacted by the pandemic. All signs point to a significant delay and thus a high unlikelihood of achieving one of LAWA's core objectives of the Project, to be operational in time for the 2028 Olympics.

For the foregoing reasons—in addition to the many other reasons explained in Part II, infra—the DEIR lacks substantial evidence for its aviation growth forecast, which undergirds the DEIR's entire environmental impact analysis.[8] In light of the dramatically changed circumstances since the Project's incept

[4] Available at https://cloud1lawa.app.box.com/s/3nxgt1xq0crmlfnj6180sqprkot5t1bi; last accessed on Feb. 9, 2021.
[5] Available at https://labusinessjournal.com/news/2020/dec/14/new-lax-chief-erbacci-navigates-challenges-covid/; last accessed on Feb. 9, 2021.
[6] Available at https://www.lawa.org/-/media/7fcedb5f432a46688c4a503b8406feed.pdf; last accessed Mar. 12, 2021.
[7] Available at https://www.mckinsey.com/industries/travel-logistics-and-infrastructure/our-insights/will-airline-hubs-recover-from-covid-19; last accessed on Feb. 9, 2021.
[8] El Segundo's November 24, 2020 PRA request asked for "[d]ocumentation supporting the statements in the ATMP DEIR that 'demand for air travel and airline activity is expected to grow consistent with the parameters used in developing the aviation forecasts for the proposed [ATMP] Project," and that these forecasts "are still valid and relevant for the long-term planning purposes of the [ATMP DEIR]" (see "Preamble", ATMP DEIR), despite the fact that these forecasts were completed prior to the COVID-19 pandemic." LAWA's response to this request does not substantiate the quoted statements from the DEIR. LAWA therefore lacks substantial evidence for this claim, in violation of CEQA.

Response: As the commenter notes, the Notice of Preparation of a Draft EIR for the proposed Project was released in April 2019, prior to the COVID-19 global pandemic which emerged in the United States in early 2020, and the Draft EIR was prepared and released in October 2020 while the COVID-19 global pandemic was ongoing.

The Draft EIR specifically addressed the uncertainties discussed by the commenter in the Preamble to both the entire Draft EIR and section of Appendix B.1 of the Draft EIR. As stated in the preamble, the impacts of the COVID-19 global pandemic, severity, and duration were still unknown at the time of the release of the Draft EIR in October 2020 (as further stated and quoted by the commenter in the second paragraph of this comment). Please see Topical Response TR-ATMP-G-1 for a discussion of major historical events and associated LAX's recovery.

The commenter suggests that LAWA should have changed the proposed Project and the Draft EIR analysis to respond to uncertainties associated with the pandemic. As further explained in Topical Response TR-ATMP-G-1, LAWA has considered these uncertainties and industry experts have estimated that global passenger demand is likely to regain pre-pandemic levels within five to six years. Such a recovery in airport operations following an exogenous shock to the system has been observed in the past (e.g., following the events of September 11, 2001, and the 2008-2009 economic crisis); in each instance, the demand in air travel has recovered and reached pre-shock levels. Such exogenous shocks can affect the pace of growth in air travel, and result in sharp dips or recoveries in demand from year to year. Over the longer term, however, the system has been shown to recover and to resume its long-term growth trajectory. Therefore, and in light of the fact that the project is designed to a help LAX to prepare early for the continued aviation growth that is projected by LAWA, SCAG, and the FAA to occur at LAX over the next several decades, there is no reasonable basis for changing the proposed Project or the Draft EIR analysis due to the pandemic. As, Mr. Erbacci, LAWA's Chief Executive Officer, explained in the December 14, 2020 Los Angeles Business Journal article cited by the commenter, when the pandemic hit LAWA reviewed all capital projects and identified those necessary to "operate the airport efficiently and safely for our employees and passengers" as well as "crucial capital programs."[1] The proposed Project is a crucial capital program.

The commenter also discusses the decrease in passenger volumes at LAX as a result of the COVID-19 global pandemic, citing the December 14, 2020 Los Angeles Business Journal article, and data published by LAWA in January 2021. Please see Topical Response TR-ATMP-G-1 for information related to the uncertainties associated with the COVID-19 global pandemic which are still pertinent in mid-2021, and how the forecasts remain acceptable for the purposes of the Draft EIR documentation.

Regarding the excerpt of Mr. Kanafani's report dated February 8, 2021 included as Attachment A of the commenter's comment letter (comment numbered 202), please see Response to Comment ATMP-AL010-202.

The commenter also cites an article published by McKinsey & Company.[2] The article discusses the potential impacts of the COVID-19 global pandemic on airline hubs and connecting passengers, in particular Origin & Destination (O&D) passengers which are defined as passengers who begin or end their trip at a specific airport, as well as strategies that hub airlines could consider while reassessing their networks, fleets, and hub airport design and operations as a result of the pandemic. As discussed in the McKinsey article, airlines rely on their hub airports to serve connecting passengers. An airline hub airport is defined as an airport having a high percentage of connecting

flights.[3] The questions raised in this article have limited relevance to LAX. As documented in Table 3-3 in Appendix B.1 of the Draft EIR, LAX's percentage of connecting passengers was 23.2 percent in FY 2018, while the remaining 76.8 percent were O&D passengers. LAX has historically been an O&D airport, where passengers begin and end their journey at LAX, with a relatively low share of connecting passengers. With approximately 65 commercial passenger airlines operating at LAX in FY 2018 (see Section 4.4.1 of Appendix B.1 of the Draft EIR), LAX is not dominated by large hubbing operations. While all three legacy carriers (American Airlines, Delta Air Lines, and United Airlines) provide flight connectivity through their facilities at LAX, they contribute to the large percentage of O&D traffic at LAX. Therefore, the discussion presented in the McKinsey article does not directly apply to operations at LAX because of the relatively low percentage of connecting activity at LAX.

The commenter also asserts that on December 10, 2020, the Board of Airport Commissioners approved a $50 million contract for a Principal Engineer/Architect team to "'advance the planning and design'" of the ATMP." That assertion is incorrect. The LAWA Staff Report that is cited in the comment does not refer to, or discuss, the LAX Airfield and Terminal Modernization Project. As described on page 2 of the Staff Report, LAWA had embarked on a multi-billion-dollar Capital Improvement Program to deliver "Gold Standard" facilities at LAX and provide a world class guest experience. As documented in the Draft EIR, the proposed Project was planned and defined to an appropriate level of detail to satisfy CEQA requirements. Therefore, contrary to the commenter's assertion, the release of the Draft EIR does not preclude LAWA from conducting advance planning and design to maintain and modernize LAX.

The commenter also questions whether it is still reasonable to assume that the proposed Project would be completed and operating on the same schedule as anticipated when the NOP was released. While the commenter asserts that construction of the Project "will likely be impacted by the pandemic" and "[a]ll signs point to a significant delay" and there is "a high unlikelihood" that the Project would be operational in time for the 2028 Olympics, the commenter does not provide any evidence in support of those claims. As discussed in revised Section 2.6.1 and shown in revised Figure 2-28 in Chapter F3, Corrections and Clarifications to the Draft EIR, the construction phasing schedule has been modified to reflect a construction start date for the LAX Airfield and Terminal Modernization Project of January 2022. However, LAWA remains committed to delivering the proposed Project and anticipates completion of the proposed improvements in time for the 2028 Olympics.

In sum, the record includes substantial evidence to support the LAX Airfield and Terminal Modernization Project activity forecast. Appendix B.1 of the Draft EIR includes a detailed discussion of the process, methodology, assumptions, and results of the activity forecasts (aircraft operations and passengers), alongside the documentation of a constrained demand scenario which clearly reflected the assumed limitations of LAX to accommodate the unconstrained activity forecasts. The activity forecasts were reviewed and approved by the Federal Aviation Administration in September 2020 (as documented in Appendix B.1 of the Draft EIR) for their use in the preparation of environmental documentation supporting the LAX Airfield and Terminal Modernization Project.

[1] Los Angeles Business Journal, New LAX Chief Erbacci Navigates Challenges From Covid, Construction, December 14, 2020. Available: https://labusinessjournal.com/news/2020/dec/14/new-lax-chief-erbacci-navigates-challenges-covid/.
[2] McKinsey & Company, Will airline hubs recover from COVID-19?, November 5, 2020. Available: https://www.mckinsey.com/industries/travel-logistics-and-infrastructure/our-insights/will-airline-hubs-recover-from-covid-19#.
[3] Transportation Research Board of the National Academies, Airport Cooperative Research Program, ACRP Report 25, Airport Passenger Terminal Planning and Design, p. I-14.

ATMP-AL010-11

Comment: C. The Environmental Baseline Used for the DEIR's Evaluation of Impacts Must be Replaced, or Supplemented, by a Baseline that Accounts for the Pandemic.

Except where indicated otherwise (e.g., for the analysis of the Project's vehicle miles traveled ("VMT") impacts), the environmental baseline used to determine the significance of the Project's impacts purports to be based on the environmental setting in April 2019, when LAWA issued the NOP. As noted earlier, however, the environmental setting changed dramatically roughly 8 months before LAWA released the DEIR for comment, with overall operations down nearly 75% compared to the previous year, and international traffic in particular down 83%.

The DEIR cites to section 15125 of title 14 of the California Code of Regulations (hereafter, "CEQA Guidelines") for the statement that "[g]enerally, the lead agency should describe physical environmental conditions as they exist at the time the notice of preparation is published." DEIR at p. 4-3. Courts have interpreted this guidance to mean that agencies must "employ a realistic baseline that will give the public and decisionmakers the most accurate picture practically possible of the project's likely impacts." *Neighbors for Smart Rail v. Exposition Metro Line Constr. Auth.* (2013) 57 Cal.4th 439, 449. Moreover, the baseline may not be "misleading or without informational value." Id. at 457.

The DEIR instead takes the approach that because a 2019 baseline would be the "default" here under CEQA, there is no need to meaningfully consider whether employing this baseline despite a nearly 75% decline in operations in one year would mislead or "give the public and decisionmakers the most accurate picture practically possible." The Preamble to the DEIR, which cites anecdotally to previous recoveries from "disruptive events" such as September 11 and the 2008 recession, is the extent of the "evidence" LAWA has marshalled in support of a 2019 baseline. This is not enough, particularly in light of the established rule that lead agencies "may, where appropriate, adjust [their] existing conditions baseline to account for a major change in environmental conditions that is expected to occur before project implementation."

Neighbors for Smart Rail, 57 Cal.4th at 452. This is especially true when, as here, a year and a half have passed between the NOP and the publication of the DEIR.

Here, a "major change" in environmental conditions is not "expected" to occur; it has occurred, and contrary to LAWA's claims, any assumption that operations will have returned to "business as usual" once the Project is completed, rather than emerged permanently altered after the present transitional period, is pure speculation. See Kanafani Report at p. 1 (stating that current changes "in work habits, commerce and social activities may become long lasting if not permanent."). If, for example, in a post-recovery aviation industry, more passenger boarding gates enable increased public health vigilance at terminals, then the growth and associated environmental impact of adding up to 29 new passenger gates as part of this Project must be analyzed against a baseline of passenger/operational capacity without the public-health benefit of 29 additional gates. LAWA's approach of assuming, without evidence, a return to 2019 conditions once the Project is completed would conceal this highly plausible effect of the Project on present capacity.

LAWA must update its CEQA baseline to reflect the current/recent reality of operations at LAX. Nowhere is that more apparent than in the context of noise. LAWA is legally obligated, under the 2020 LAX Stipulated Variance approved by Caltrans, to timely produce quarterly reports showing, among other things, the noise impacts of LAX on surrounding communities. As of this writing, the last Quarterly Noise Report released by LAWA for LAX covered the first quarter of 2020 (i.e. before the COVID-19 pandemic took hold).[9] LAWA is falling well short of the applicable deadline of "45 days after the end of the calendar quarter" set by the Variance. LAWA's delay in providing this information is not only inconsistent with the Variance, is also directly relevant to the ATMP DEIR. In the absence of those quarterly reports. the public does not have complete information about how the substantial and sustained decline in LAX operations has impacted noise conditions around LAX. Anecdotal evidence indicates LAX's noise impacts have declined during the COVID-19 pandemic and are currently lower than the 2019 baseline LAWA relied on in the ATMP DEIR. LAWA must promptly release the delayed quarterly reports to provide the actual noise monitoring data. All the missing data must also be added to the ATMP DEIR and should form the basis for a revised baseline for the analysis of the Project's noise impacts.

For the foregoing reasons, LAWA must replace, or supplement the 2019 baseline with a baseline that accounts for the effects of the pandemic on the airport's operations.

[9] Up until recently, LAWA had only released the third quarter 2019 Quarterly Noise Report. On January 4, 2021 LAWA released the fourth quarter 2019 report and on February 8, 2021 LAWA released the first quarter 2020 report.

Response: It would be inappropriate to revise the environmental baseline to account for the COVID-19 pandemic. Use of the 2019 baseline in the Draft EIR impacts analysis is consistent with the requirements of CEQA, as described in the introduction to Chapter 4 in the Draft EIR, and is also consistent with the case law cited by the commenter. Further, courts have held that updating baselines to reflect "rapidly-changing economic conditions" is not

appropriate, particularly where, as here, ongoing uncertainties and fluctuations in conditions make long term predictions difficult. (*Citizens for Open Government v. City of Lodi* (2012) 205 Cal.App.4th 296, 319.) As the FAA notes in its May 2021 report accompanying the final Terminal Area Forecast (TAF) for 2020, "[t]here is uncertainty associated with the forecasts because of the uncertainty regarding the path of the [COVID-19] pandemic and its economic impacts."[1]

The 2019 baseline is a realistic and representative baseline that gives the public and decision-makers the most accurate picture practically possible of the proposed Project's likely impacts estimated to occur nine years later (i.e., 2028). It would be inappropriate to use a baseline that reflects a snapshot in time of an extremely atypical and volatile situation, such as the COVID-19 pandemic. The commenter does not provide a source for the statement that there has been a "nearly 75%" decline in operations at LAX. While LAX experienced a substantial decline in operations in 2020, compared to 2019, activity levels at LAX in June 2021 (i.e., the most current data available at the time of this writing) are notably greater than those in 2020. According to monthly passenger activity data tracked by LAWA, passenger activity levels in June 2021 were up over 370 percent compared to those in June 2020 (i.e., 4,887,694 in June 2021 compared to 1,003,861 in June 2020.[2] Passenger levels in May 2021 were up over 700 percent compared to those of May 2020 (i.e., 4,054,092 in May 2021 compared to 575,756 in May 2020), and passenger activity levels also substantially improved in April 2021, up by over 1,000 percent, compared to April 2020 (i.e., 3,074,936 in April 2021 compared to 299,366 in April 2020).[3] The uniqueness of the COVID-19 situation and the rapidly evolving dynamics of air travel recovery, both domestically and internationally, would make for a very unstable baseline. For example, a 2020 COVID-19 baseline would be very different from a 2021 COVID-19 baseline, neither of which would be representative of the typical operations that occurred in 2019 nor representative of typical operations assumed to occur at buildout of the Project in 2028. To revise the baseline to account for the COVID-19 pandemic would be misleading and would not provide the public and decision-makers with meaningful information regarding the potential environmental impacts of the LAX Airfield and Terminal Modernization Project.

For additional information regarding future air travel levels and aviation demand in light of the COVID-19 pandemic, please refer to Topical Response TR-ATMP-G-1.

[1] U.S. Department of Transportation, Federal Aviation Administration, Forecast Process for 2020 TAF, page 2, May 2021. Available: https://taf.faa.gov/Downloads/ForecastProcessfor2020TAF.pdf.
[2] Los Angeles World Airports, Traffic Comparison (TCOM) Los Angeles International Airport Calendar YTD January to June, July 2021. Available: https://www.lawa.org/-/media/cf73d89fc22042ac91b9816db77a01b9.pdf.
[3] Los Angeles World Airports, Val Y. Hunter, Chief Management Analyst, 2019 – 2021 LAX Passenger Total for Jan – May, provided June 29, 2021.

ATMP-AL010-12

Comment: D. THE DEIR Fails to Recognize the Reasonably Foreseeable Relocation of the Mercury Air Cargo Facility.

LAWA's description of the Project fails to identify where the Mercury Air Cargo Facility will be relocated, despite the fact it is an enabling project and must be removed prior to construction of Terminal 9. The DEIR notes that relocation of the Mercury Air Cargo Facility "would occur upon expiration of lease and is an independent project; facility demolition is part of the Proposed Project." DEIR at p. 2-75. This, however, is contradicted by the renegotiated lease between LAWA and Mercury for the facility.

As noted in the DEIR, the Mercury Air Cargo Lease was set to expire on September 30, 2021, but the term of the lease has been extended by two years and includes two one-year extension options. See BOAC Agenda for March 4, 2021, Item 4 staff report.[10] Thus, LAWA is failing to disclose either 1) an anticipated delay in the construction timeline for Terminal 9 and the Project generally, or 2) the planned relocation site for the facility, given that it is reasonably foreseeable that the Mercury Air Cargo Facility will need to be relocated during the lease period. Under CEQA, LAWA must disclose where the Mercury Air Cargo Facility will be relocated and analyze all significant impacts from the relocation in this EIR; and/or, in order to provide an accurate project description, disclose the anticipated delay in construction of Terminal 9.

[10] Available at https://lawa.granicus.com/MetaViewer.php?view_id=4&event_id=1452&meta_id=48682 ; last accessed Mar. 9, 2021.

Response: As noted in the comment, on March 4, 2021, the Board of Airport Commissioners approved a two-year extension of Mercury Air Cargo's lease, which was previously due to expire on September 30, 2021. With the extension, the new expiration date is September 30, 2023, with two one-year extension options at LAWA's discretion. In addition, the approved lease includes a 180-day cancellation provision by either party.[1] The lease extension was contemplated in the Draft EIR, which states, on page 2-65, "Mercury Air Cargo's lease at this location will expire in 2021; a lease extension is currently underway." Moreover, the Report to the Board of Airport Commissions associated with the Board's consideration of the lease specifically notes that the Mercury Air Cargo facility lies in the footprint of the proposed Terminal 9, and that the purpose of the lease amendment is to provide LAWA with flexibility associated with the development of Terminal 9, while minimizing disruption to Mercury Air Cargo's operations.

As described above and in Response to Comment ATMP-PC035-73, the construction phasing schedule has been modified to reflect a construction start date for the LAX Airfield and Terminal Modernization Project of January 2022 (see revised Section 2.6.1 and Figure 2-28 in Chapter F3, Corrections and Clarifications to the Draft EIR). The reasons for the revised construction schedule, which are explained in Response to Comment ATMP-PC035-73, are unrelated to the Mercury Air Cargo lease. As shown in the revised Figure 2-28, enabling projects associated with Terminal 9 are expected to

commence in mid-2022 and extend through early 2025. Construction of Terminal 9 itself is expected to commence in mid-2023 and extend through mid-2028. The modifications to Mercury Air Cargo's lease, including the two-year extension and the 180-day cancellation provision, do not conflict with this schedule. (It should be noted that the lease modifications would also not conflict with the construction phasing schedule provided in the Draft EIR, recognizing that the Mercury Air Cargo occupies only a portion of the northwest corner of the Terminal 9 site and all other enabling projects, which are shown in Figure 2-26b of the Draft EIR, as revised in Chapter F3, Corrections and Clarifications to the Draft EIR, could proceed in 2022 with the Mercury Air Cargo facility still in place.) As a result, the Draft EIR correctly notes that relocation of the Mercury operation following expiration of the lease would occur independently from the proposed Project. At the expiration of the lease, the Mercury operation could be consolidated with another Mercury facility located at LAX or with cargo operations at another existing cargo facility. Alternately, the operation could be relocated to a different site at LAX that is not currently used for cargo.

For the reasons described above, it is not reasonably foreseeable that the Mercury Air Cargo facility will need to be relocated during the lease period. As noted above, the lease will expire prior to commencement of Terminal 9 construction; moreover, the approved lease includes a cancellation provision that can be invoked by LAWA at any time. Similarly, the comment that the Draft EIR must disclose where the facility will be relocated and analyze all significant impacts from the relocation is inaccurate. As noted in the Draft EIR, relocation of the Mercury operation following expiration of the lease would occur independently from the proposed Project; relocation of the facility to a new site or in the form of consolidation at an existing facility is not an enabling project with respect to the proposed Project. Should it be required, any necessary environmental evaluation would be conducted as part of that action.

Table 2-4 (page 2-65) of the Draft EIR has been revised to reflect the new lease expiration date and terms. Please see Chapter F3, Corrections and Clarifications to the Draft EIR. None of the other information in the table with respect to the Mercury Air Cargo facility, including the determination that relocation of the facility would occur independently from the proposed Project, requires modification.

[1] Los Angeles World Airports, Report to the Board of Airport Commissioners, SUBJECT: Approval of Fourth Amendment to Lease LAA-8388 with Mercury Air Cargo, Inc. for a cargo facility at Los Angeles International Airport, March 4, 2021.
Available:
https://lawa.granicus.com/MetaViewer.php?view_id=4&clip_id=713&meta_id=48737.

ATMP-AL010-13

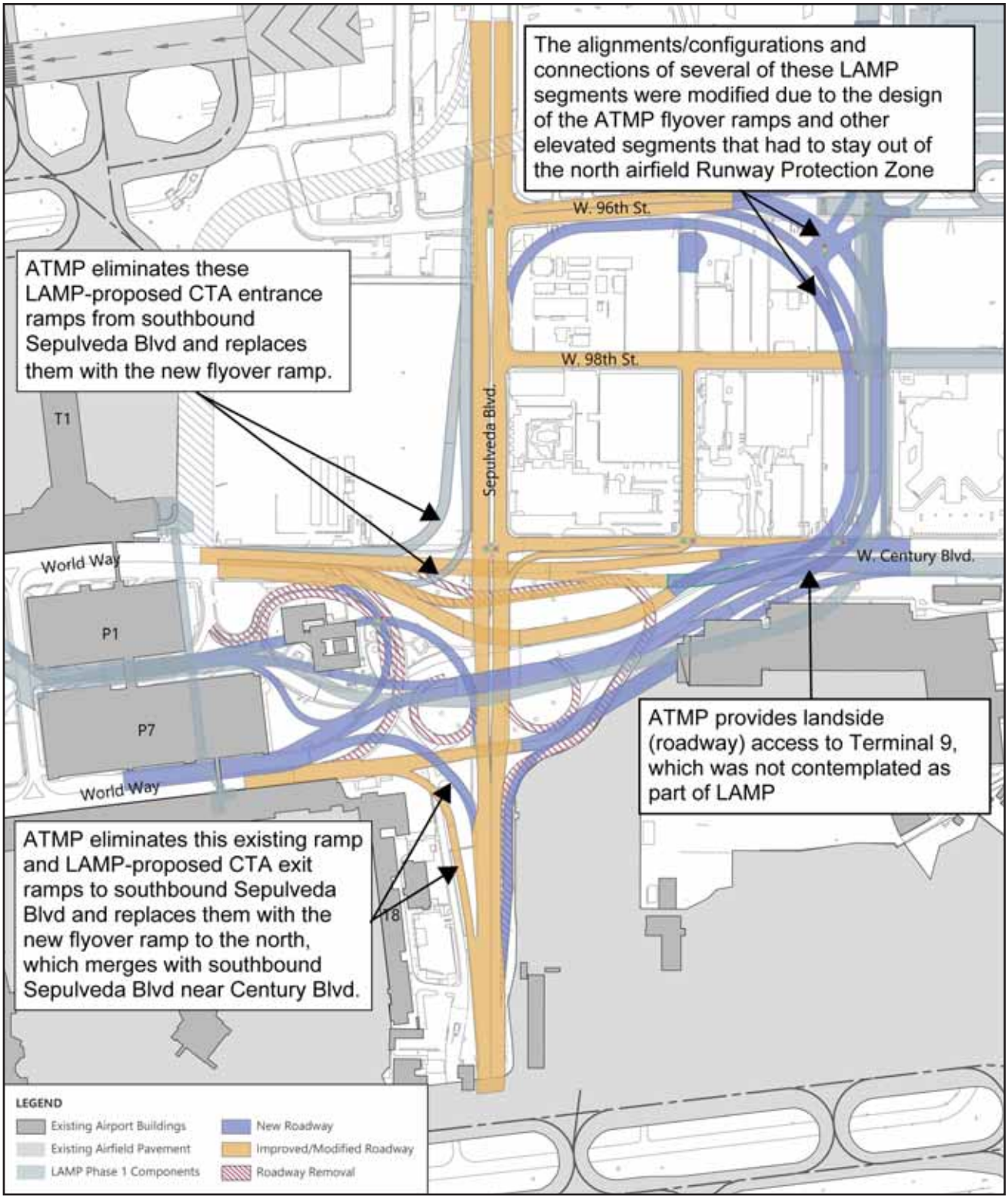
Comment: E. The DEIR's Description of the Project's Surface Transportation Components Is Misleading.

The Project Description omits important details relating to the Project's surface transportation system. In particular, the DEIR states that the project ". . . would build upon improvements approved as part of the LAX Landside Access Modernization Program [LAMP] . . ." DEIR at p. 2-39. The DEIR also refers to "refinements" to the LAMP road system, with the proposed Project's improvements being "integrated with" the LAMP elements. The document does not, however, specifically identify which, if any, LAMP projects would be eliminated or significantly modified as a result of the proposed Project. The EIR should be revised to identify the specific changes to the LAMP road system that will be undertaken in connection with the ATMP. The revised EIR should also include graphics showing this information.

Response: The refinements to the LAX Landside Access Modernization Program's roadway system that are associated with the LAX Airfield and Terminal Modernization Project pertain to the area immediately east of the Central Terminal Area (CTA). Figure 1 shows the roadway system approved for that area under the LAX Landside Access Modernization Program and Figure 2 shows the proposed roadway system associated with the proposed Project, along with the automated people mover (APM) station proposed in conjunction with Terminal 9. The following summarizes the key refinements to the LAX Landside Access Modernization Program's roadway system:

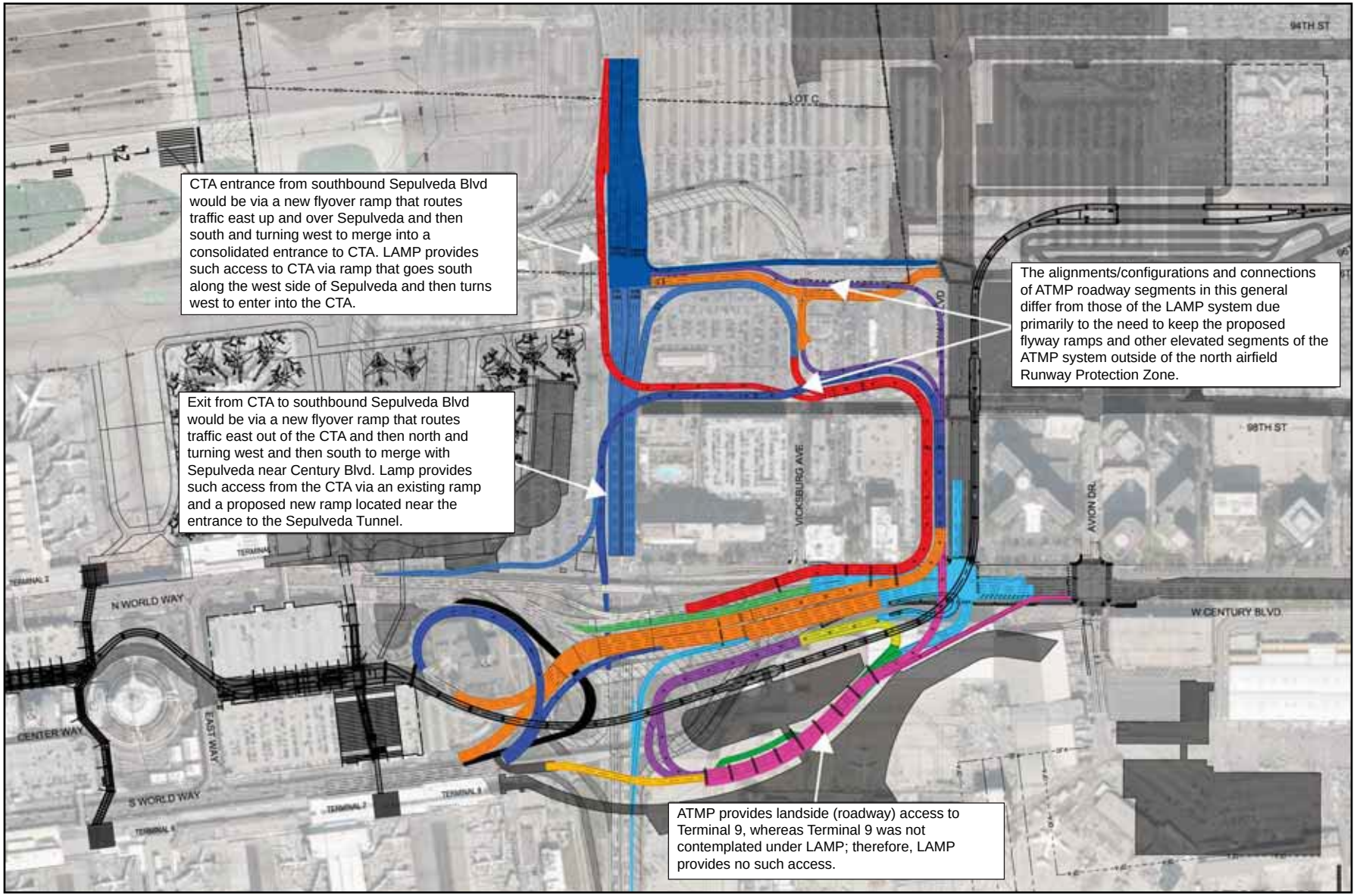
Access to the CTA from Southbound Sepulveda Boulevard:
Under the LAX Landside Access Modernization Program, existing access to the CTA from southbound Sepulveda Boulevard, which is currently provided by Sky Way, would be replaced by a new exit that parallels the west side of Sepulveda Boulevard and splits into an upper ramp for access to the departures level and a lower ramp for access to the arrivals level. Under the proposed Project, access to the CTA from southbound Sepulveda Boulevard would be provided by a flyover ramp that would route CTA-bound traffic up and over Sepulveda Boulevard turning east and then south on the proposed elevated roadway system, and then west to merge with other airport-related traffic entering into the CTA. This refinement serves to provide additional storage/queueing space for vehicles heading into the CTA so that airport-related traffic does not back-up onto Sepulveda Boulevard if there is substantial congestion within the CTA, such as has been the case with the existing exit on Sky Way. In addition to helping reduce congestion on southbound Sepulveda Boulevard, the routing of CTA-bound traffic onto the flyover ramp serves to provide a centralized point of entrance for traffic coming into the CTA (i.e., would merge with traffic coming into the CTA via Century Boulevard and via northbound Sepulveda Boulevard), which would facilitate signage to, and wayfinding for, drivers coming into the CTA.

Access from CTA to Southbound Sepulveda Boulevard:
Under the LAX Landside Access Modernization Program, access from the lower level of the CTA to southbound Sepulveda Boulevard would remain as it is today, but a new exit ramp from the upper level of the CTA to southbound Sepulveda Boulevard would be added just north of the existing exit. Both of those exits would be in close proximity to



Source: CDM Smith, June 2021
Prepared by: CDM Smith, June 2020

LAX Airfield and Terminal Modernization Project	Refinements to Landside Access Modernization Program (LAMP) Roadway System that are Reflected in the Airside and Terminal Modernization Project Roadway System	Figure 1



Not to Scale

Sources: CDM Smith, June 2021

Prepared by: CDM Smith, July 2021

LAX Airfield and Terminal Modernization Project	Key Features of ATMP Roadway System that are Refinements to LAMP Roadway System	Figure **2**

the entrance to the Sepulveda Boulevard Tunnel, which sometimes experiences congestion from both airport-related traffic and non-airport traffic, especially relative to the merging and weaving of traffic positioning to either access the I-105 freeway or remain on Sepulveda Boulevard at the end of the tunnel. Under the proposed Project, traffic exiting the CTA that is bound for southbound Sepulveda Boulevard would instead be routed directly east out of the CTA, then to the north and west on the new elevated roadway system, and then cross over Sepulveda Boulevard, turning south to drop down to, and merge with, southbound Sepulveda Boulevard at a location approximately one-third mile north of the Sepulveda Boulevard Tunnel entrance. This roadway system refinement serves to reduce congestion on southbound Sepulveda Boulevard attributable to airport-related traffic.

Access to Terminal 9:
The LAX Airfield and Terminal Modernization Project's proposed roadway system includes roadways to provide landside access to Terminal 9, which was not proposed at the time the LAX Landside Access Modernization Program was formulated. Such access to Terminal 9 is integrated with the system proposed under the LAX Landside Access Modernization Program through: the use of the future intersection of Jet Way Boulevard and Century Boulevard; the use of the realigned exit to eastbound Century Boulevard from northbound Sepulveda Boulevard, which provides access to the Jet Way Boulevard/Century Boulevard intersection; and, the use of the roadway system exiting the CTA to connect with Sepulveda Boulevard (i.e., the Terminal 9 curbside roads connect with that CTA exit system via an elevated ramp over Century Boulevard). It should be noted that in conjunction with the aforementioned refinements to the roadway system proposed under the LAX Landside Access Modernization Program, the LAX Airfield and Terminal Modernization Project includes a refinement to the proposed APM system with the addition of a station at Terminal 9.

Other minor refinements to the Landside Access Modernization Program roadway system can be seen in comparing Figures 1 and 2, which mostly pertain to the configurations and connections of roadway segments located between 96th Street and 98th Street that were altered by the proposed flyover ramps Specifically, as described in Section 2.4.3.1 of the Draft EIR, the placement and design of the proposed flyover ramps and related components of the elevated roadway system avoid the runway protection zone of the north airfield. This, in turn, caused certain roadway segments proposed under the LAX Landside Access Modernization Program to be relocated and realigned southward along 98th Street.

ATMP-AL010-14

Comment: The DEIR also does not disclose the Project's change in parking. The ATMP would involve the acquisition of a number of properties, including existing parking facilities. No indication is provided, however, as to how many parking spaces exist on the properties to be acquired and how many, if any, would continue to be available to serve the parking demand generated by the proposed Project. The revised EIR should identify the number of existing short- and long-term parking spaces and the number of spaces as a result of the Project. It must also specifically identify the number of parking spaces to be provided

in the Terminal 9 structure. Further, it must describe how the ATMP's total parking supply compares to the parking demand generated by the ATMP and LAX as a whole.

Response: The commenter claims that the Draft EIR should have disclosed "how many parking spaces exist on the properties to be acquired and how many, if any, would continue to be available to serve the parking demand generated by the proposed Project." CEQA does not require a parking analysis. "As a fundamental principle, '[e]ffects analyzed under CEQA must be related to a physical change.' A social or economic change in [and of] itself is not a significant effect on the environment. CEQA is not concerned with ... direct social effects that do not contribute to a secondary physical impact." (*Saltonstall v. City of Sacramento* (2015) 234 Cal.App.4th 549, 585, citing CEQA Guidelines, §§ 15358(b), 15064(e) and (f)(6), 15382, 15358, 15360 and Pub. Resources Code, § 21060.5, internal citations omitted.) The "social inconvenience of having to hunt for scarce parking spaces is not an environmental impact." (*San Franciscans Upholding the Downtown Plan v. City & County of San Francisco* (2002) 102 Cal.App.4th 656, 697.) Recognizing this, in 2009, the State Office of Planning and Research eliminated a pre-existing question relating to parking capacity from "Appendix G" of the State CEQA Guidelines. (See State CEQA Guidelines, Appendix G.) The comment does not allege any connection between parking spaces associated with the proposed Project and any significant physical impact on the environment.

Nevertheless, LAWA has provided the following information about parking for informational purposes. As discussed in Section 2.5.2 of the Draft EIR, development of the proposed roadway improvements would require the acquisition of several properties, including a portion of a Los Angeles Community College District property, some of which is leased to a private parking operator for commercial airport parking; two commercial parking lots, operated by WallyPark Express and Sunrise LAX Airport Parking, that are promoted as airport parking lots; and a portion of an Los Angeles Department of Water and Power (LADWP) parcel that is used for non-airport parking. In total, there are approximately 620 parking spaces on the properties to be acquired. Not all of these parking spaces provide airport parking.

As identified in Section 2.4.2.2 of the Draft EIR, the proposed Project would include development of a parking facility at Terminal 9 of up to 700,000 square feet. The facility would accommodate up to 1,000 parking spaces, which is approximately 60 percent more spaces than would be removed as a result of the acquisitions. In addition, LAWA is currently constructing a 4,300-space parking structure at the future Intermodal Transportation Facility-West (ITF-West),[1] with an option for a second phase. The ITF-West parking facility will be located north of 96th Street and west of Airport Boulevard, immediately north/northeast of the properties to be acquired. The number of parking spaces that would be constructed at the Terminal 9 parking facility, combined with the number of parking spaces under construction at the ITF-West, far exceeds the number of spaces on the properties to be acquired.

[1] City of Los Angeles, Los Angeles World Airports, Connecting LAX – Intermodal Transportation Facility (ITF - West) webpage. Available: https://www.lawa.org/connectinglax/intermodal-transportation-facility, accessed May 6, 2021.

ATMP-AL010-15

Comment: The DEIR also fails to include key components of the Project pertaining to its construction. Construction of the ATMP is scheduled to begin in late 2021 and run through 2028, while construction of the roadway system improvements would begin in early 2022 and would be completed in early 2028. DEIR at pp. 2-77, 2-78. The DEIR acknowledges that there will be some temporary detours and rerouting of traffic onto nearby streets and onto newly constructed temporary access roads. Id. Yet the DEIR fails to include the necessary details of this "temporary" routing of traffic. CEQA requires that an EIR contain sufficient information in the description of the project needed for evaluation of the environmental impact and that this information include a general description of the project's principal engineering proposals. CEQA Guidelines §15124(c). Here, construction of the ATMP would span at least six years and would almost certainly have effects on the local and regional transportation network. Consequently, the revised EIR must include a detailed description of the Project's transportation-related construction activities. At a minimum, this would include specific details pertaining to construction phasing, truck haul/delivery routes, staging locations, contractor parking locations, and work hours. As discussed in Part V.C of this letter, LAWA should cooperate with El Segundo to reduce airport-related traffic congestion on City streets during construction of the ATMP.

Response: Section 15124(c) of the State CEQA Guidelines, which is cited in the comment, states that the project description of an Environmental Impact Report shall contain "[a] general description of the project's technical, economic, and environmental characteristics, considering the principal engineering proposals if any and supporting public service facilities." Chapter 2 of the Draft EIR provides a description of the proposed Project's characteristics based on the level of planning that is appropriate and has been completed for the proposed Project. Based on the available Project planning information, Section 2.6 of the Draft EIR describes Project phasing, construction staging and contractor parking, construction haul routes, and temporary access during construction. Additional details, such as those indicated in the comment regarding the aforementioned activities, would be developed in conjunction with more detailed Project planning, which is the normal process for large multi-year construction projects. The Project description information presented in Chapter 2 of the Draft EIR is sufficient to address potential impacts associated with the proposed Project. Please also see Response to Comment ATMP-AL010-134.

ATMP-AL010-16

Comment: F. The DEIR Falsely Claims That the Project Is Consistent with Achieving Airfield Balance.

LAWA claims that the Project is consistent with developing a balanced airfield to provide for more efficient and effective use of airport facilities. DEIR at p. 4.6-30. However, LAWA cannot support this statement with substantial evidence. Initially, during the construction of the Project, there will be 9 months during which a runway in the north airfield will be closed between 2022 and 2023, leaving all flights to use the remaining 3

runways. DEIR at p. 4.7.1-39. LAWA notes that when a runway is closed, the FAA will assign runways to maintain a balanced airfield. Id.

Response: The Draft EIR's conclusion that the proposed Project is consistent with developing a balanced airfield is supported by substantial evidence. Table 4.6-5 of the Draft EIR summarizes how the proposed airfield improvements to the north airfield would contribute towards a balanced airfield by improving operational efficiency through enhancing safety, better supporting the fleet operating at LAX, and providing operational flexibility. Specific details regarding the operational benefits of Project elements affecting airfield operations are described in Section 2.4.1 and Appendix B.2 of the Draft EIR. Please see Response to Comment ATMP-AL010-17 regarding additional discussion of airfield balance with implementation of the proposed Project, including recognition that the airfield balance between the north airfield and the south airfield would be improved with completion of the Project in 2028 compared to existing (2018) conditions.

The commenter is incorrect in claiming that "there will be 9 months during which a runway in the north airfield will be closed between 2022 and 2023." As described in Section 2.6.4 of the Draft EIR, temporary runway closures of the north airfield runways would be required to construct some elements of the proposed Project. However, rather than one continuous 9-month closure, there would be one 4.5-month closure occurring in 2023 and one 4.5-month closure occurring in 2024. Chapter 4 of the Draft EIR describes the analyses completed to evaluate and disclose the potential aircraft noise, air quality, and GHG impacts associated with the redistribution of operations during the temporary runway closures.

ATMP-AL010-17

Comment: LAWA provides no analysis regarding the current airfield balance and has been derelict in its duty to provide quarterly noise reports to allow the public, and El Segundo, to understand the current balance in the airfield. As discussed above, as of the date of this letter, LAWA's last quarterly noise report was for Quarter 1 of 2020. Without this information and an analysis of the current state of the airfield balance, LAWA cannot support the statement that the Project would be consistent with developing a balanced airfield.

Response: Quarterly noise reports for all four quarters in 2020, as well as for the first quarter of 2021, are available at https://www.lawa.org/lawa-environment/noise-management/lawa-noise-management-lax/quarterly-noise-reports-and-contour-maps.

As described in Section 3 of Appendix B.2 of the Draft EIR, airfield and airspace simulation models were developed to evaluate the effects of the proposed Project on aircraft operations. The two scenarios modeled were:

- No Project – future-year conditions without the proposed Project
- With Project – future-year conditions with the proposed Project

The With Project scenario models included the elements of the proposed Project that would affect the airfield and, therefore, captured operational changes associated with the proposed Project, including runway utilization. Outputs from the airfield and airspace simulation models were considered when analyzing the proposed Project's impacts related to aircraft noise (Section 4.7.1) and air pollutant emissions, including GHG emissions, from aircraft operations (Section 4.1 and Section 4.4, respectively).

Section 5 in Appendix F.1 of the Draft EIR discusses runway utilization. The table below summarizes the percentage of arrivals and departures utilizing the north and south airfields by year. As shown in Table 1, utilization of the north and south airfields is much closer to a balanced airfield in 2028 compared to baseline conditions in 2018.

Table 1
Operations in the North Airfield and South Airfield (2018 and 2028)

Year	Arrival		Departure	
	North Airfield	South Airfield	North Airfield	South Airfield
2018	52.6%	47.4%	53.2%	46.8%
2028	50.1%	49.9%	50.2%	49.8%

Source: HMMH, Inc., Appendix F.1 *Aircraft Noise Analysis Technical Report,* Table 5, October 2020.

As described on page 4-3 in Chapter 4 of the Draft EIR, the analytical framework for the environmental impact analysis used LAX operational data for 2018 to define the existing baseline conditions for the evaluation of operational impacts related to aircraft noise and aircraft-related air pollutant and GHG emissions. LAWA selected 2018 because "a full year's worth of operational data for LAX was considered necessary and appropriate to characterize existing baseline conditions, since the operational characteristics of LAX, especially in terms of aircraft operations, vary throughout the year based on seasonal travel and holiday travel." Therefore, an analysis of runway utilization at the time the Draft EIR was published (i.e., October 2020), including quarterly reports for each quarter of 2020, would not contribute to the analysis of airfield balance in the Draft EIR. Additionally, quarterly reports alone would not be useful for an analysis of the operational characteristics for LAX because these characteristics vary throughout the years; a full year's worth of data is necessary.

ATMP-AL010-18

Comment: Furthermore, LAWA must not only analyze the balance in overall operations, but also the balance between the different types of operations, including landing and takeoff, that occur at LAX. For example, a widebody aircraft taking off from LAX would create more noise and a greater disturbance than the same widebody aircraft landing at LAX. El Segundo, having analyzed previous Quarterly Noise Reports, has also found that the south runways have a larger share of widebody aircraft operations throughout the day, and the difference is especially notable for widebody departures from the south runway complex. Exhibit 3, Analysis of 2019 Q1 and Q2 LAX Quarterly Noise Reports.

This issue is of particular concern to El Segundo because the Project will add more aircraft gates on the southern side of LAX than the northern side. This will likely have the effect of increasing south runway usage and contributing to further runway imbalance. Additionally, proposed Concourse 0 on the north side will likely be used for smaller aircraft (DEIR at p. 2-24) while Terminal 9 will mainly be an international terminal with mostly widebody operations taking off from the south runways (DEIR at p. 2-27).

Response: As described in Response to Comment ATMP-AL010-17, airfield simulation models were developed that captured operational changes that would occur with implementation of the proposed Project, including changes in runway utilization. The With Project simulation model assigned aircraft types to specific runways based on the future airfield configuration and gate layout with implementation of the proposed Project.

As described on page 7 in Appendix F.1 of the Draft EIR, the analysis of aircraft noise was based on the airfield simulation results and accounted for the specific noise and performance data for each aircraft type operating at LAX. The analysis also considered the percentage of aircraft arriving and departing on each runway. As such, the Draft EIR accounted for noise differences between arriving, departing, narrowbody, and widebody aircraft.

Please see Response to Comment ATMP-AR010-17 regarding airfield balance and the year used to define the existing baseline conditions for the evaluation of operational impacts, including aircraft noise impacts.

ATMP-AL010-19

Comment: In sum, LAWA must release the tardy noise reports and use that data to analyze the current state of runway balance at LAX in order to support the statement that the Project would not increase runway imbalance.

Response: The content of this comment is substantively the same as comment ATMP-AL010-17; please refer to Response to Comment ATMP-AL010-17.

ATMP-AL010-20

Comment: G. LAWA Has Previously Committed to Removal of the West Remote Gates and Cannot Credit Their Removal Against the 27 Additional Gates Created by the Project.

LAWA has previously committed to removal of the West Remote Gates ("WRGs") and cannot credit their removal against the 27 additional gates created by the ATMP.[11] In the 2014 programmatic EIR for the MSC, LAWA committed to replace the WRGs, such that all WRGs would be decommissioned at full buildout of the MSC. MSC Program DEIR at pp. 2-5, 4-16, fn.10.[12] Additionally, in response to comments in the MSC Program Final EIR, LAWA confirmed that it would "decommission the West Remote Gates/Pads once the future phase(s) of the MSC Program is completed, consistent with the approved 2004 LAX Master Plan." MSC Program FEIR at pp. 2-20, 2-31.[13] The 2004 LAX Master

Plan EIS/EIR likewise stated that the MSC would replace the WRGs, such that all WRGs would be decommissioned at full buildout of the MSC. LAX Master Plan FEIS/FEIR at p. 2-85.[14]

Now, LAWA claims that up to 15 of the WRGs are being replaced by the gates created by this Project. DEIR at p. 2-38. If this is the case, then the Project and MSC Program are necessarily interdependent projects that must be analyzed together under CEQA. Furthermore, LAWA is improperly double-counting removal of the WRGs to offset impacts from both projects. The revised EIR must address this issue before approval of the Project and before beginning the final phase of the MSC Program.

[11] On December 23, 2019, we submitted comments on behalf of El Segundo concerning LAWA's improper determination that the MSC South Project is fully entitled. Exhibit 4, El Segundo Comments on Ricondo MSC South Memo. Despite our request that they be included in the record for the Project, LAWA does not appear to have done so. Our December 23, 2019 comments are incorporated by reference in El Segundo's comments on the DEIR.
[12] Available at https://www.lawa.org/lawa-msc-north/project-documents; last accessed on Feb. 9, 2021.
[13] Available at https://www.lawa.org/lawa-msc-north/project-documents; last accessed on Feb. 9, 2021.
[14] Available at https://www.lawa.org/lawa-our-lax/environmental-documents/documents-certified/2004-lax-master-plan-program; last accessed on Feb. 9, 2021.

Response: The commenter is incorrect that LAWA has "credited" removal of the West Remote Gates (WRGs) to offset impacts from the LAX Airfield and Terminal Modernization Project. Please see Topical Response TR-ATMP-G-2 for a discussion of reasons why decommissioning 15 of the WRGs as part of the proposed Project was correctly represented in the Draft EIR. Please also see the topical response regarding the assertion that the LAX Airfield and Terminal Modernization Project and the MSC Project must be analyzed together under CEQA.

With respect to Footnote 11 in this comment, as the commenter has included their December 23, 2019 as an attachment to its comment letter on the LAX Airfield and Terminal Modernization Project Draft EIR, LAWA has determined that, although it was not separately required by CEQA to respond to the letter on MSC Phase 2, it is appropriate to respond to the allegations in that letter in the context of this Final EIR. The comments have been assigned numbers ATMP-AL010-310 through ATMP-AL010-318. Responses to these comments are provided in Topical Response TR-ATMP-G-2 and/or in the individual responses to comments.

ATMP-AL010-21

Comment: 1. MSC South Has Been Improperly Segmented from Environmental Review of the Project.

The MSC Program EIR divided the MSC into an MSC North and MSC South phase, including a project-level analysis for MSC North, and deferred environmental analysis of MSC South to a later date. The MSC Program EIR contains (at least) two references to future environmental review for MSC South: that construction emissions will be discussed under project-level environmental review at such time that LAWA determines the timing of any future phase(s) of the MSC, and that impacts of future projects will be analyzed at a project level once "LAWA determines the timing of such improvements." MSC Program DEIR at pp. 2-51, 4-11, 4-19.

In 2019, LAWA "approved" 8 additional gates at MSC South based on a cursory environmental review document, the Ricondo MSC South Memo, which was only made available upon request.[15] The Ricondo MSC South Memo included no public participation and claimed that there was no further review required because MSC South, as proposed, was within the "scope" anticipated in the MSC Program EIR. Yet, MSC South's purpose and design had been modified and fundamentally altered to operate as an enabling project for the ATMP. As such, MSC South did not undergo proper environmental review and must be further analyzed with the ATMP as part of the same project or as an enabling project.

The 2014 MSC Program EIR did not mention or recognize the ATMP as a future foreseeable project in its cumulative impact analysis. See MSC Program DEIR at p. 4-56 (table showing cumulative construction projects' peak daily emissions estimates); see also id. at pp. 3-5 through 3-7 (table listing ongoing and future projects at LAX). However, by 2019, LAWA was already well aware that the ATMP would add additional passenger gates because LAWA had released the NOP for the ATMP and MSC South's design was substantially changed in anticipation of the ATMP. According to the BOAC August 1, 2019 Agenda staff report:

The MSC South Project was originally envisioned to be an extension of the MSC North, with similar architecture, function, and scale. To build to this concept would require significant delivery time and investment, as well as necessitate the demolition of the American Airlines (AA) Super Bay Hangar, for which we have no adequate replacement in the near future. However, due to recent growth in passenger activity - as well as ongoing renovation efforts throughout LAX that requires the closure of other gates - there is an urgency to deliver more domestic gates in the near term. Moreover, *with the planned development of Terminal 9 and Concourse 0, there is no longer the same need to use MSC South as a fully functioning international terminal as was originally envisioned.*

Exhibit 5, BOAC August 1, 2019 Agenda Staff Report for Item 15 at p. 3 (emphasis added).

MSC South was initially described as an international terminal in 2014. Id. However, the Ricondo MSC South Memo states that MSC South will instead operate as an "open chair" during ATMP construction, and the ATMP DEIR notes that the American Eagle ("AE") Commuter Terminal operations would be transferred to MSC South. See Exhibit 6, Ricondo MSC South Memo at pp. 11, 14; DEIR at p. 2-75 (relocation of operations currently at the AE Commuter Terminal to the MSC would occur in conjunction with completion of the south concourse). Thus, MSC South is actually an enabling project for

the ATMP. Furthermore, the AE Commuter Terminal currently sits where Terminal 9 is proposed to be built and moving AE's operations is a prerequisite to demolition of the AE Commuter Terminal. The "open chair" concept will allow LAWA the flexibility to maintain operations while ATMP construction is underway.

The DEIR completely fails to acknowledge that MSC South is part of the Project, and therefore fails to disclose the environmental impacts of the "whole of [the] action" to approve these two interrelated projects. See CEQA Guidelines § 15378(a). LAWA has improperly piecemealed MSC South from the Project, despite knowing that they are both "part of a single, coordinated endeavor." *Assn. for a Cleaner Environment v. Yosemite Community College Dist.* (2004) 116 Cal.App.4th 629, 639. The revised EIR must include environmental review of MSC South within the ATMP EIR and analyze its impacts along with the Project.

[15] See footnote 11, supra. El Segundo provided comments before the BOAC meeting, which are fully incorporated and attached herein as Exhibit 4, El Segundo Comments on Ricondo MSC South Memo.

Response: Please see Topical Response TR-ATMP-G-2 for a discussion of the environmental analysis conducted for Phase 2 of the MSC Program, commonly referred to as the MSC South project, and the relationship of the Phase 2 project to the LAX Airfield and Terminal Modernization Project. In particular, as described in the topical response, Phase 2 of the MSC Program is accounted for in the LAX Airfield and Terminal Modernization Project Draft EIR in the list of projects considered for the cumulative impact assessment in accordance with State CEQA Guidelines Section 15130(b). (The list of cumulative projects is described in Table 3-1 of the LAX Airfield and Terminal Modernization Project Draft EIR.) Therefore, the environmental impacts of the LAX Airfield and Terminal Modernization Project, in conjunction with implementation of Phase 2 of the MSC Program and other cumulative projects, were evaluated in the Draft EIR for the LAX Airfield and Terminal Modernization Project. Additionally, as further explained in Topical Response TR-ATMP-G-2, the relocation of American Eagle commuter gates to the MSC is a separate project with independent utility. The claim that MSC Phase 2 has been impermissibly "segmented" from the proposed ATMP Project is incorrect; please see the topical response.

ATMP-AL010-22

Comment: 2. LAWA Must Commit to Enforceable Limits on Use of Any Remaining WRGs and Must Analyze the Levels of Use for These Gates and Related Bus Operations.

Also disconcerting is the fact that LAWA is now refusing to decommission all WRGs as initially anticipated and instead would leave three WRGs operational. LAWA cannot have it both ways, claiming credit for removal of the WRGs to offset both the increase in gates in the MSC and the ATMP, while at the same time reneging on the commitment to decommission all WRGs. LAWA's shifting promises for removal of the WRGs emphasizes

the need for a firm and demonstrable commitment to remove the WRGs as the Project progresses towards completion.

The revised EIR must include an enforceable schedule for the decommissioning of the WRGs (i.e., removal of all passenger loading facilities and associated airfield markings). Moreover, LAWA's commitment should include a provision that LAWA can no longer rely on the decommissioned WRGs for operations, or credit the remaining three WRGs against future projects.

Response: Please see Topical Response TR-ATMP-G-2 discussing LAWA's proposal to decommission 15 WRGs as described in the LAX Airfield and Terminal Modernization Project Draft EIR, the LAX Airfield and Terminal Modernization Project's consistency with the MSC South Project (Phase 2 of the MSC Program), and the use of the remaining three WRGs following Project implementation.

ATMP-AL010-23

Comment: In light of the history described above, El Segundo remains skeptical of LAWA's "commitment" to decommission the WRGs as part of the ATMP. For example, the DEIR states that the 15 removed WRGs will no longer be used for regularly-scheduled commercial flights. DEIR at pp. 1-9, 2-20, 2-38, 2-62. However, it is unclear whether this means LAWA is leaving open the possibility that the gates can be used for non-regularly scheduled flights or if LAWA can "reopen" any of the decommissioned gates, especially when only 9 of the 15 WRGs will be actually displaced by the extension of Taxiway D. Id. at pp. 1-6, 2-20, 2-38, 2-62. LAWA must specify and lay out the details for decommissioning the WRGs, particularly in light of the DEIR's failure to include a construction schedule for decommissioning the WRGs.

Response: Please see Topical Response TR-ATMP-G-2 regarding LAWA's previous commitments concerning the decommissioning of WRGs.

ATMP-AL010-24

Comment: Without clear and enforceable commitments, El Segundo is concerned LAWA would continue to use the WRGs with impunity. El Segundo is specifically proposing that for each new passenger gate that becomes operational, LAWA will confirm that a corresponding WRG is removed until a maximum of 3 WRGs remain. WRG removal must include demolishing or disabling all passenger boarding facilities and removing pavement markings associated with the gate. LAWA would retain full discretion to determine the order in which WRGs are removed and which WRGs ultimately remain (up to the maximum of 3). If LAWA removes WRGs to accommodate the westerly extension of Taxiway D before new passenger gates become operational, LAWA may "bank" those removed WRGs. LAWA would also report which passenger gates have become operational and which WRGs have been decommissioned.

Response: Please see Topical Response TR-ATMP-G-2 regarding the decommissioning of 15 WRGs associated with implementation of the LAX Airside and Terminal Modernization Project.

The removal/decommissioning of 15 WRGs, and the construction of Concourse 0 and Terminal 9, are intrinsic project elements. The "banking" proposal suggested by the commenter is unnecessary. LAWA does not propose to use the WRGs "with impunity" either before or after construction of some or all of the proposed Project. Rather, LAWA proposes to construct the proposed Project as described in the EIR.

ATMP-AL010-25

Comment: The removal of the WRGs is also suspect due to the continued use and construction of a "sterile bus drop-off platform for passenger busing operations" as part of the ATMP. DEIR at p. 2-27; see also id. at p. 2-28 (Terminal 9 would include a sterile international bus curb for passenger busing operations, if needed). Additionally, LAWA is constructing a new LAX Bus Yard Facility, as identified in Table 3-1. Id. at p. 3-7. According to the DEIR, the proposed terminal improvements seek to improve passenger experience, increase airlines' efficiency and reduce busing activity on the airfield through removal and replacement of most WRGs and elimination of the associated busing of passengers. DEIR at pp. 1-4, 2-18, 5-5. Yet, LAWA is still investing in busing, making us skeptical of the actual drawdown of operations in WRGs and remote gates generally.

Response: Although one of the goals stated in the LAX Airfield and Terminal Modernization Project Draft EIR is to reduce busing activity on the airfield, the Draft EIR does not propose to eliminate all airfield busing operations; some airfield busing activities would remain necessary, even with proposed Project implementation, to maintain connectivity between CTA terminals. Chapter 2 of the Draft EIR identifies a sterile bus drop off platform at Concourse 0 for passenger busing operations, if needed (Section 2.4.2.1), and both a secure (domestic) and a sterile (international) bus curb at Terminal 9 for passenger busing operations, if needed (Section 2.4.2.2).

As described in Topical Response TR-ATMP-G-2, LAWA has a long-standing interest in reducing reliance on the WRGs for the purposes of improving the quality of the passenger experience and avoiding the need to bus passengers between the CTA and the WRGs. However, airfield busing between terminals within the CTA is a standard part of operations at LAX. For example, the West Gates at Tom Bradley International Terminal have a bus facility that supports busing operations between the international terminal and flights occurring at other terminals with the CTA. In addition, a new security checkpoint was recently opened in Terminal 1 to support airside buses operating between Terminal 1 and Bradley West.[1]

The Concourse 0 bus platform and the Terminal 9 bus curb are intended to provide flexibility so that busing can occur at these facilities, should it prove necessary. The facilities are not designed to facilitate increased use of the WRGs. In fact, because the proposed Project includes removing or decommissioning 15 out of 18 WRGs, the use of buses to access the WRGs would decrease. Including these facilities, while prudent, would not expand the use of busing at LAX.

[1] Transportation Security Administration (TSA), TSA Begins Screening Operations at New LAX Security Checkpoint in Terminal 1, May 1, 2021. Available: https://www.tsa.gov/news/press/releases/2021/05/01/tsa-begins-screening-operations-new-lax-security-checkpoint-terminal.

ATMP-AL010-26

Comment: Any remaining WRGs must include enforceable limits on operations, including guidelines for use during peak conditions and for overflow. LAWA is assuming that there will be low or no use of the WRGs, reducing the apparent capacity at LAX. LAWA must provide evidence that the WRGs will actually be at a reduced capacity and describe what these capacity levels will actually be on a daily basis. Without enforceable limits on operations or any evidence showing reduced capacity at the WRGs, LAWA must analyze and assume full use of the WRGs at levels consistent with past use.

Response: Please see Topical Response TR-ATMP-G-2 regarding the use of the WRGs with implementation of the proposed Project.

ATMP-AL010-27

Comment: Moreover, bus gates and operations that remain in place throughout the airport must also have enforceable limits. LAWA is planning to build a new bus facility, listed as an enabling project in Table 3-1 of the DEIR. This begs the question: why would LAWA invest in a new bus facility if it is actually planning to eliminate use of the WRGs? LAWA must explain in the DEIR why the bus facility is needed and how it would be used in the near term (prior to WRG decommissioning) and long term (after WRG decommissioning). In the absence of that information, we are concerned that LAWA may be planning to continue its business as usual, or even expand, busing operations to remote gates at LAX. LAWA must analyze the past and future level of use for the bus gates and operations, including the number of buses in operation, where they are or will be parked, and the number and location of bus gates at all terminals. For the new bus facility, LAWA must indicate how big the facility will be, where the buses will be parked and how this fits with the removal of the WRGs and remote terminal.

Response: Please see Response to Comment ATMP-AL010-25 regarding the proposed bus facilities at Concourse 0 and Terminal 9. Regarding the commenter's statement that detailed bus operations be evaluated, the LAX Airfield and Terminal Modernization Project is currently at a preliminary design level of planning sufficient for evaluating the potential environmental impacts. Detailed information regarding the size of the bus facilities associated with the proposed Project would be developed during Project-specific design.

ATMP-AL010-28

Comment: II. The DEIR Is Fatally Flawed Due to Its Failure to Analyze Project Impacts Beyond the Aspirational Buildout Year of 2028.

Unlike in previous EIRs for airport expansion projects, in which LAWA has claimed that the project would have no effect on passenger/operational capacity and thus the project would effectively have no operational impacts, here LAWA has taken a new, but still troubling, approach. Once again, LAWA claims that passenger/operational capacity would be essentially unaffected by any of the Project's improvements, and future demand/capacity with the Project would be the same as future demand/capacity without the Project. DEIR at pp. 6-4 and 6-5; see generally DEIR, Appendix B.1. In prior EIRs, LAWA used this reasoning to justify concluding that projects' impacts were less than significant or nonexistent. Here, however, for all impacts that LAWA concludes would be significant and unavoidable in the Project completion year (2028) even if the Project were not built—i.e., for impacts which LAWA claims are not the direct or even indirect result of the Project, but would occur anyway—LAWA nonetheless concludes that these impacts are significant and unavoidable Project impacts. Effectively, LAWA is hedging its bets that the BOAC, and the City of Los Angeles, will approve this much-touted, long anticipated Project regardless of its impact on the environment and communities surrounding the airport, which for decades have shouldered the burden of LAX's negative externalities.

Response: With respect to the LAX Airfield and Terminal Modernization Project Draft EIR, the Draft EIR used an existing conditions baseline (2018 or 2019) to analyze impacts related to future passenger and aircraft activity levels, with limited and appropriate exceptions as described in the introduction to Chapter 4 of the Draft EIR. Therefore, the environmental effects of the growth that is projected to occur between 2018 and 2028 were fully evaluated and documented in the Draft EIR in accordance with CEQA and the State CEQA Guidelines. LAWA did not devise this approach in order to "hedg[e] its bets" that the proposed Project would be approved despite its significant impacts. Rather, LAWA performed the analysis in order to comply with CEQA and the State CEQA Guidelines, and in order to identify and disclose the environmental impacts of the proposed Project and to mitigate the Project's significant impacts where feasible. LAWA's approach has been to disclose the environmental effects of the proposed Project in order to inform the public, and to enable decision-makers to decide whether to approve the proposed Project, or an alternative to the proposed Project (including the No Project Alternative), with an understanding of the environmental consequences of their decision. Please see Topical Response TR-ATMP-G-3 regarding the bases for why 2028 is the appropriate horizon year for evaluating the impacts of the proposed Project, and not a later year as an impacts analysis horizon year. As described in the topical response, 2028 is the expected buildout year for the proposed Project and, as such, is a reasonable timeframe for analyzing Project impacts. In addition, Topical Response TR-ATMP-G-3 includes, for informational purposes, a general analysis of impacts beyond 2028.

To the extent the comment raises questions related to analyses in previous EIRs prepared for projects at LAX, those projects have been approved for some time, and the time to file litigation challenging those projects under CEQA has expired. As such, the environmental analysis in those prior EIRs is presumed to comply with CEQA. (Public

Resources Code, Section 21167.2.) Thus, comments on the adequacy of those prior EIRs do not raise significant environmental issues regarding the LAX Airfield and Terminal Modernization Project and do not require a response. (See State CEQA Guidelines Section 15088.)

ATMP-AL010-29

Comment: As explained in the following pages, however, LAWA would be wrong to assume this approach is a prophylactic against a CEQA challenge. First, as a general matter, CEQA requires lead agencies to use "best efforts" to estimate all "reasonably foreseeable" impacts. CEQA Guidelines §§ 15144, 15064(d). Second, LAWA's claim that the Project would have no effect on LAX's passenger/operational capacity is undercut by the forecast data included in the DEIR. Third, it is simply common sense that the Project would expand LAX's operational capacity. Fourth, the DEIR is part of a sustained pattern and practice of thwarting CEQA's requirements by claiming that the Project will have no effect on aviation growth, and therefore no impacts associated with growth. Fifth, the DEIR lacks evidence for its claims that the airport without the Project could accommodate the same operations/year as with the Project in 2028, 2033 and 2045. Each of these is a reason that the DEIR's analysis is fatally flawed and is independent of the others, and thus a separate ground for finding the analysis legally inadequate.

Response: This comment introduces the remainder of the comments in this section of the comment letter, including comments ATMP-AL010-30 through 55. Please see responses to these comments below.

ATMP-AL010-30

Comment: A. CEQA Requires Lead Agencies to Use "Best Efforts" to Estimate All "Reasonably Foreseeable" Impacts.

While the DEIR analyzes impacts for the Project completion year of 2028, except in limited instances discussed in the relevant impact discussions below, the document does not analyze impacts beyond 2028. Thus, even though the Project represents an enormous, unprecedented expansion of the airport, including for the first time putting passenger facilities on the east side of Sepulveda Boulevard (18 new passenger gates at the proposed new Terminal 9), the DEIR analyzes the Project's impacts only until the aspirational Project buildout year. In effect, the DEIR just focuses on construction impacts for this huge Project, and ignores the fact that the Project will be a permanent capital improvement to the airport, with added capacity for daily operations continuing indefinitely into the future. The DEIR rationalizes this approach by claiming, through its aviation growth forecast, that operations would be the same with or without the Project, yet the DEIR lacks evidence for this claim and in fact shows that the Project would enable LAX to continue operating at capacity for longer than if the Project were not built. LAWA therefore has not justified truncating its CEQA analysis at the Project buildout year and ignoring the noise, air quality, greenhouse gas ("GHG") and other impacts of the Project's operations.

LAWA cannot claim that analyzing operational impacts out to 2045 would be "speculative" because here no speculation is required: LAWA has provided detailed forecasts of anticipated passenger and aircraft operations out to 2045, 17 years beyond the aspirational buildout year and 26 years beyond the baseline year. DEIR, Appendices B.1 and B.2. The DEIR provides no rationale for concluding that impacts in 2028 would be significant and unavoidable based on forecasted future operations through 2045, while failing to make significance conclusions for impacts beyond 2028. As El Segundo's expert consultants note in their attached reports, LAWA's approach here of truncating its analysis of the Project's operational impacts to a buildout year less than 10 years away is not the norm, especially given the size and scope of the Project. Specifically, it is "surpris[ing] that the future analysis study year is only 10 years from the baseline year (2028), whereas many large projects include study years which are 20 years in the future so as to avoid a future year too close to the current year once the project is implemented." Svinth Report at p. 3 (noting that the EIR for San Jose International Airport's 2017 Master Plan analyzed noise impacts 20 years into the future). See also Kanafani Report at p. 2 ("The DEIR fails to assess the effect of the improvements on traffic growth and on the resulting environmental impact of this growth.").

CEQA requires lead agencies to use "best efforts" to estimate all "reasonably foreseeable" impacts. CEQA Guidelines §§ 15144, 15064(d). Because LAWA claims to know the level of passengers/operations at LAX each year through 2045, and has used these growth forecasts to evaluate the Project's impacts in 2028, the DEIR violates this basic CEQA requirement. See Svinth Report at p. 3 ("Considering that planning projections have been completed to [2045], it seems reasonable to also analyze aircraft noise in the surrounding communities to 2045 or at least to 20 years beyond the [P]roject baseline year.").

The California Supreme Court has held that an EIR must contain enough information for the public to discern the magnitude of a project's environmental impacts. In *Cleveland National Forest Foundation v. San Diego Association of Governments*, the Court held that the EIR for SANDAG's 2010-2050 Regional Transportation Plan/Sustainable Communities Strategy ("RTP/SCS") adequately described the project's GHG emissions' inconsistency with the governor's executive order on reducing climate change impacts because the public could discern the emissions' "upward trajectory" and conclude that they would conflict with the order. (2017) 3 Cal.5th 497, 514–15. Nonetheless, the Court advised that the EIR's GHG analysis should not "serve as a template for future EIRs. Under CEQA, '[t]he determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the public agency involved, based to the extent possible on scientific and factual data.' [CEQA Guidelines § 15064(b).] As more and better data become available," the rigor with which an agency evaluates a project's impacts must increase accordingly. 3 Cal.5th at 518.

Here, by contrast, LAWA relies on a forecast of what aircraft operations will be in 2045 in order to support the DEIR's conclusions regarding aviation growth and associated impacts. Yet, even though it has this data, LAWA provides zero information that would help the public discern what the Project's environmental impacts would be in any year after 2028, whether they would be significant, and if so, how significant and to what extent these impacts would grow over time. "An EIR's designation of a particular adverse

environmental effect as 'significant' does not excuse the EIR's failure to reasonably describe the nature and magnitude of the adverse effect." 3 Cal.5th at 514-15. "An adequate description of adverse environmental effects is necessary to inform the critical discussion of mitigation measures and project alternatives at the core of the EIR." Id.

For the foregoing reasons, the DEIR's analysis of all Project impacts is inappropriately cut off at 2028. LAWA must revise the DEIR to account for these future impacts and recirculate the revised document for public comment.

Response: With respect to the commenter's assertions that the Draft EIR's aviation forecast analysis is flawed, please see Section 2.3.1.2.2 of the Draft EIR. As explained there, the annual activity forecast and regression analysis prepared by LAWA's aviation experts determined that aircraft operations would be the same in 2028 with or without the proposed Project, and that the proposed Project would not result in increased aviation and/or passenger activity levels or capacity at LAX. This analysis is supported by substantial evidence as documented in Appendix B.1 of the Draft EIR. Please Topical Response TR-ATMP-G-1 for further discussion of the validity of this forecast.

With respect to the comment that the Draft EIR should have analyzed impacts out to 2045, please see Topical Response TR-ATMP-G-3 regarding the reasons why 2028 is the appropriate horizon year for evaluating the impacts of the proposed Project. In addition, Topical Response TR-ATMP-G-3 includes, for informational purposes, a general analysis of impacts beyond 2028. Please also see Response to Comment ATMP-AL010-215 regarding the horizon year for analyses in other EIRs cited by the commenter.

In preparing the Final EIR for the proposed Project, LAWA has reviewed all of the comments received, including this comment, and has carefully considered the responses to these comments and other information provided in the LAX Airfield and Terminal Modernization Project Final EIR. None of the information provided in the Final EIR meets the criteria for recirculation of an EIR as outlined in Section 15088.5 of the State CEQA Guidelines.

ATMP-AL010-31

Comment: B. LAWA's Claim That the Project Would Have No Effect on LAX's Passenger/Operational Capacity Is Undercut by the Forecast Data Included in the DEIR.

As noted earlier, the DEIR rationalizes its approach of cutting off its impact analysis at 2028 by claiming, through its aviation growth forecast, that future operations would be the same with or without the Project regardless of year. Yet the DEIR lacks evidence for this claim and in fact shows that the Project would enable LAX to continue operating under capacity for longer than if the Project were not built. Thus, contrary to the DEIR's underlying assumption, the Project would enable greater growth and aviation operations at LAX, and all of the associated impacts of these greater operations, than if the Project were not built. Because of this, LAWA's repeated claims throughout the DEIR that the Project would have "no effect" on the passenger capacity of LAX are false, and

mislead the public and decisionmakers to believe that the Project would have no impact on the environment. DEIR at pp. 6-4, 6-5.

Response: As documented throughout Appendix B.2, Operational Analyses Report, of the Draft EIR, the airfield simulations analyzed activity levels in 2018 and 2028, consistent with the build-out horizon year of the proposed Project. Please also refer to Topical Response TR-ATMP-G-3 for additional discussion regarding the appropriateness of focusing the analysis of impacts on Project buildout in 2028.

The commenter correctly states that the technical analyses documented in Appendix B of the Draft EIR concluded that the forecasted aircraft operations and passenger demand would not change as a result of the proposed Project improvements (see Section 3.6 of Appendix B.2).

Contrary to the commenter's assertion, substantial evidence supporting the Draft EIR's conclusions has been provided in the record, consistent with the State CEQA Guidelines' definitions (see Section 15384 of the State CEQA Guidelines). Specifically, LAWA's aviation experts have documented facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts consistent with CEQA's definition of "substantial evidence." (See Section 15384 of the State CEQA Guidelines.) Appendix B of the Draft EIR includes detailed analysis of the relevant activity forecasts and information supported by data and other reference materials cited within the appendix. Section 3.6 of Appendix B.2 of the Draft EIR clearly discloses the difference in annualized average all-weather delay results between the proposed Project scenario and the No Project scenario. It also clearly documents how these differences in average delay results would not result in increased activity levels at LAX, as further documented in Responses to Comments ATMP-AL010-205 through ATMP-AL010-207. The commenter does not provide statements or evidence to support the unfounded claim that the proposed Project improvements would enable greater growth. Substantial evidence in the record demonstrates the opposite.

Thus, contrary to the commenter's assertion, the Draft EIR clearly documented the estimated impacts on the environment associated with the proposed Project for review by the public and decisionmakers. Chapter 4 of the Draft EIR provides more than 400 pages of analysis of potential environmental impacts associated with the proposed Project improvements. In addition, the Final EIR includes, for informational purposes, an analysis of potential impacts in 2033. Please see Topical Response TR-ATMP-G-3. This analysis does not alter the EIR's conclusions.

ATMP-AL010-32

Comment: As explained in detail in the Kanafani Report, the DEIR's growth analysis (Appendices B.1 and B.2) contain a fatal flaw in LAWA's claim that the Project would not contribute to aviation growth. These appendices' underlying conclusions are that: (1) by 2029, airlines will have to set in gear operational changes to prepare for unconstrained growth at LAX which will start causing noticeable congestion around 2031, when there will be approximately 833,000 operations/year (=118.6 MAP); and (2) the ability of the airfield

to accommodate any more operations will effectively cease in 2045, at approximately 853,000 operations/year (=127.9 MAP). Thus, 2029 is the "tipping point" between unconstrained/constrained operations, but actual "gridlock" would not occur until 2045.

Response: In this comment, the commenter refers to Mr. Kanafani's comment letter provided by the commenter as an attachment (numbered as Comments ATMP-AL010-202 through ATMP-AL010-210). Contrary to the commenter's assertion, there is no flaw in the technical analyses supporting Appendix B of the Draft EIR. The subject analyses are valid and supported by substantial evidence, as documented in Responses to Comments ATMP-AL010-202 through ATMP-AL010-210.

The commenter is correct that the Draft EIR assumed that airlines would begin to react and make operational adjustments as early as 2029, two years before LAX would reach 833,000 annual aircraft operations, resulting in an estimated annualized average all-weather delay of 15 minutes. See Section 4.4.2 of Appendix B.1 of the Draft EIR.

However, contrary to the commenter's supposition, nothing in the Draft EIR states or suggests that the ability of the airfield to accommodate more aircraft operations would "effectively cease in 2045". Notably, the commenter does not provide any citations or reference to the Draft EIR to support this erroneous statement. As documented in Section 4.4.3 of Appendix B.1 of the Draft EIR, the intent of the technical analyses was to estimate the number of annual aircraft operations in 2045 (the end of the forecast period documented in the Draft EIR) which would reflect the anticipated slowdown in aircraft operations in a constrained environment starting in 2029.

There is no evidence that 2029 would be a "tipping point," as the commenter suggests, or that LAX would reach gridlock in 2045, as discussed above. As documented in Section 4.2.1 of Appendix B.1, it is important to note that 15 minutes of average delay is not considered a fixed limit or ceiling. FAA guidance discusses a range between 10 and 20 minutes. What is considered acceptable level of delay may change over time and vary among aircraft operators and airports. Estimating with precise certainty how much delay each aircraft operator at LAX would tolerate, and at which point in time aircraft operators would react, would be speculative. Accordingly, the definition of airfield practical capacity was used to provide an indicator for planning purposes.

ATMP-AL010-33

Comment: Appendix B.2, Exhibit 3-2, asserts that in 2028 the Project would, in fact, result in a reduction of annualized delay per operation of approximately 1 minute compared to without the Project. DEIR, Appendix B.2 at p. 3-7 ("Differences in operational conditions are expected under the With Project scenario compared with the No Project scenario as a result of airfield modifications and improvements, and associated operational changes[.]"). This disclosure alone immediately calls into question the DEIR's claim that the Project would have no effect on operational capacity since, as Appendices B.1 and B.2 concede, capacity is largely a factor of the airfield's ability to operate up to the point where delays begin to interfere with those operations. Nonetheless the DEIR appears

simply to assume that the Project would have "no effect" on operations despite the disclosure that the Project would reduce airfield delays.

Response: The commenter discusses the results of the airfield simulations documented in Appendix B.2 of the Draft EIR, in which the technical analyses estimated annualized average all-weather delays under the proposed Project scenario would be 1.3 minutes lower than under the No Project scenario (see Tables 3-2 and 3-3 and Exhibit 3-2 in Appendix B.2 of the Draft EIR). Accordingly, Section 3 of Appendix B.2 of the Draft EIR clearly disclosed the difference in annualized average all-weather delay results between the proposed Project scenario and the No Project scenario. It also clearly documented how these differences in average delay results would not result in increased activity levels at LAX, as further documented in Responses to Comments ATMP-AL010-205 through ATMP-AL010-207.

ATMP-AL010-34

Comment: The DEIR moreover assumes, without evidence, that even though the reduction in airfield delay due to the Project would more than double during the 10 years between 2018-2028 (see DEIR, Appendix B.2, Exhibit 3-2), the reduction in airfield delay attributable to the Project would not continue to grow exponentially after 2028. If Exhibit 3-2 were to include additional data points plotting the Project-induced reduction in airfield delay out to 2045, instead of stopping at 2028 as it does now, the chart would likely show the full picture: that over time, the Project's reducing effect on airfield delay would grow, thus extending into the future the airport's ability to accommodate demand before delay begins to significantly interfere with operations. Tellingly, LAWA has not provided this data because if it did, LAWA would have to acknowledge that that the Project would have an effect on operational capacity and the impacts associated with those operations.

Response: As documented throughout Appendix B.2, the airfield simulations analyzed activity levels in 2018 and 2028, consistent with the buildout horizon year of the proposed Project. Please also refer to Topical Response TR-ATMP-G-3 for additional discussion regarding the appropriateness of focusing the analysis of impacts on Project buildout in 2028. This topical response also provides, for informational purposes, a general discussion of potential conditions in 2033 with and without the proposed Project. That discussion does not identify any new substantial adverse environmental effect of the proposed Project or any substantial increases in the severity of any environmental impacts.

The commenter speculates as to what annualized average delays at LAX might be under the With and Without Project scenarios if the technical analyses were conducted for activity levels beyond 2028. As discussed above, the technical analyses documented in Appendix B.2 of the Draft EIR appropriately considered 2028 as the buildout year of analysis. It would have been speculative to try to forecast what might occur in future years. CEQA does not require an agency to foresee the unforeseeable or to speculate about project impacts. (See State CEQA Guidelines, Sections 15144, 15145.) Appendix

B.2 and the Draft EIR appropriately conclude that the forecasted aircraft operations and passenger demand would not change as a result of the proposed Project improvements.

ATMP-AL010-35

Comment: Put another way, due to the exponential nature of delay, which the DEIR acknowledges in Appendices B.1 and B.2, if one curve were plotted on top of the 2018/2028 Without Project data points and another curve were plotted on top of the 2018/2028 With Project data points, these two curves most likely would continue rising—with the With Project curve rising at a faster rate—as the years progress after Project buildout.[16] Thus, in 2045, the reduction in average airfield delay attributed to the Project would likely be substantially greater than in 2018 and 2028. Assuming this is true—and it is LAWA's burden to prove otherwise by "substantial evidence"—then the DEIR's assertions that the Project would not have an effect on passenger/operational capacity are false, and the DEIR's impact analyses, and mitigation and alternatives analyses must be comprehensively revised to reflect this.[17]

[16] In response to El Segundo's February 1, 2021 CPRA request, LAWA provided a document which appears to do just this. Exhibit 7, June 5, 2018 LAX NASIP Technical Analyses at p. 9. As the graph at page 9 of this document illustrates, the average delay reduction attributable to the Project increases exponentially as the years progress.
[17] El Segundo's November 24, 2020 PRA request asked for "all documents showing that construction of the ATMP, including the proposed improvements to the airfield, would not have the effect of causing this operational delay to occur later than if the Project were not built.'" LAWA's response to this request does not substantiate the DEIR's assertions. LAWA therefore lacks substantial evidence for this claim, in violation of CEQA.

Response: Similar to comment ATMP-AL010-34, the commenter continues to speculate on what the technical analysis results would have shown if analyses beyond 2028 were conducted, which is beyond the proposed Project build-out year and, therefore, beyond the scope of the Draft EIR analyses documented in Appendix B.2 of the Draft EIR. See Response to Comment ATMP-AL010-34 and TR-ATMP-G-3 regarding the analysis of the proposed Project beyond the buildout year of 2028.

In Footnote 16, the commenter refers to a document obtained through a request under the California Public Records Act (CPRA) submitted to LAWA by the City of El Segundo (submitted by the commenter as Exhibit 7). The commenter suggests that the annualized average delay results depicted on Slide 9 of Exhibit 7 increase exponentially. As documented in Section 4.2.2 of Appendix B.1 of the Draft EIR, the relationship between the increase in the number of aircraft operations and the average delays is defined as "exponential." Although the delay curves displayed on Slide 9 of Exhibit 7 show exponential characteristics, the difference between the two curves is minimal. As depicted, the difference between the baseline and the With Project average annual delay is less than 1 minute, at an activity level of 2,013 daily aircraft operations. That difference is approximately 1.5 minutes at an activity level of 2,253 daily aircraft operations. At approximately 2,400 daily aircraft operations, that difference is still 1.5

minutes. Therefore, although the commenter is correct that the average annualized delay results follow exponential curves, the distance between the exponential curves is relatively "flat" such that the gap between the two curves does not increase substantially as a result of an increase in daily aircraft operations.

In the last sentence of the comment and in Footnote 17, the commenter asserts that there is not substantial evidence to support the Draft EIR's conclusions that the proposed Project would not have an effect on "passenger/operational capacity" and that LAWA has the "burden" of proving this conclusion. As a preliminary matter, the determination of whether an agency's CEQA conclusions are supported by substantial evidence is based on the entire record of the agency's administrative proceedings. (See *Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 392.) A person challenging an administrative decision bears the burden of showing that the agency's findings are not supported by substantial evidence. (*Al Larson Boat Shop, Inc. v. Board of Harbor Commissioners* (1993) 18 Cal.App.4th 729, 740.)

In this case, substantial evidence in the record supports LAWA's conclusions. Specifically, LAWA's aviation experts have documented facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts in Appendix B of the Draft EIR, consistent with CEQA's definition of "substantial evidence." (See State CEQA Guidelines Section 15384.) Appendix B includes approximately 90 pages of detailed analysis and information supported by data and other reference materials cited within the appendix. These analyses concluded that the forecasted aircraft operations and passenger demand (and airline scheduling practices to meet such demand) in 2028 would not change as a result of the proposed Project improvements (see Section 3.6 of Appendix B.2 of the Draft EIR). These conclusions are based on substantial evidence in the record, which demonstrates that the Draft EIR adequately analyzed the potential environmental impacts and mitigation measures (see Chapter 4 of the Draft EIR), and alternatives (see Chapter 5 of the Draft EIR).

ATMP-AL010-36

Comment: The Kanafani Report further describes this glaring omission. Appendix B.2, Exhibit 3-2 "clearly demonstrates that by reducing delays the capacity of the airfield, which is the limiting capacity of the airport, is increased by the proposed improvements." Kanafani Report at p. 3. Even if the roughly 1 minute savings in delay per aircraft operation in 2028 were insignificant in terms of impact on traffic growth, which LAWA has not shown to be the case, this Project-induced savings "would increase rapidly past 2028 resulting in a significant impact from the improvements." Id. However, "this increase in capacity has not been taken into account in the estimation of impacts of the improvements on traffic growth and on the development of the constrained traffic forecast." Id. Thus, the Kanafani Report concludes, "[t]he analysis in the forecasting section of the DEIR should be performed with and without the [Project] in order to correctly assess the impact of the improvements on traffic growth" through 2045. Id.

Response: The commenter cites several excerpts from Professor Kanafani's comment letter. Please see Responses to Comments ATMP-AL010-204 through ATMP-AL010-206.

Please also refer to Topical Response TR-ATMP-G-3 for additional discussion regarding the appropriateness of focusing the analysis of impacts on Project buildout in 2028, and the uncertainty and speculation with attempting to evaluate impacts beyond 2028.

In addition, analyses of the difference in average delays of 1.3 minutes between the proposed Project and No Project scenarios have been documented in Appendix B.2 of the Draft EIR. These analyses, conducted by LAWA's aviation experts, concluded that the forecasted aircraft operations and passenger demand (and airline scheduling practices to meet such demand) in 2028 would not change as a result of the proposed Project improvements (see Section 3.6 of Appendix B.2 of the Draft EIR).

ATMP-AL010-37

Comment: The Kanafani Report furthermore finds "wide variations in delay around the annualized total average delay for the various operational conditions and around the average savings from the project." Id. Thus, while the average reduction in delay due to the Project in 2028 may be approximately 1 minute, specific savings for some operating configurations, for instance under "West IFR operations" and "East MVFR conditions," would be far more significant. "Such gains . . . are masked when using only the annualized total average" and "will be even more significant when the analysis is carried beyond 2028." Id. at 4. Thus, the Kanafani Report concludes, "[t]he results of the model should be carefully analyzed to take into consideration potential large delay savings during specific operational conditions and their potential impact on traffic growth." Id.

Response: The commenter cites several excerpts from Professor Kanafani's comment letter. Please see Responses to Comments ATMP-AL010-207 and ATMP-AL010-210.

ATMP-AL010-38

Comment: The DEIR attributes the Project's delay-reducing effect to various "airfield modifications and improvements" including the proposed extension of Taxiway D, which would increase "operational flexibility," and the proposed additional Runway 6L exit taxiways, which would "eliminat[e] the need for increased arrival spacing during east flow operating conditions." DEIR, Appendix B.2 at p. 3-7. Although the DEIR acknowledges these improvements' role in reducing airfield delay, the DEIR claims without evidence that this reduction in delay does not translate to an increase in passenger capacity or operations. Id. at p. 3-8; see Exhibit 8, August 28, 2018 NASIP Briefing at p. 18 (stating that "[f]orecast growth in operations will increase delays" without the Project, but that with the Project "airfield and terminal improvements should allow airfield delays to remain manageable through 2033 to 2035 forecast timeframe."). The Kanafani Report states, however, that "[t]hese improvements, by streamlining the exit process in both directions on runway 6L/24R, will reduce runway occupancy time and increase the throughput, or capacity of the runway." Kanafani Report at p. 3.[18]

[18] Notably the list of airfield improvements to which LAWA attributes the reduction in airfield delay from the Project does not include the proposed extension of Taxiway C; see Part III, infra.

Response: The commenter is incorrect that the proposed Project improvements would result in increased passenger capacity or operations. Contrary to the commenter's assertion, there is substantial evidence in the record, including the results presented in Section 3.6 of Appendix B.2 of the Draft EIR, to support the conclusion that the incremental benefit of east flow operating configurations provided by the proposed Project improvements does not change the results of the forecasts of aircraft operations and passengers. Additionally, improvements to the taxiway system, including the extension of Taxiway D, depicted on Figure 2-4 in Section 2.3 of the Draft EIR, were included in the airfield simulations. Any operational flexibility associated with these taxiway improvements were, therefore, part of the airfield simulation results documented in Appendix B.2 of the Draft EIR. Please see Response to Comment ATMP-AL010-35, as well as Responses to Comment ATMP-AL010-205 through ATMP-AL010-207, for further explanation.

In the last sentence of the comment, the commenter cites Mr. Kanafani's comment letter. Please see Response to Comment ATMP-AL010-205 for a discussion regarding spacing (or in-trail separations) during east flow operating configurations.

Footnote 18 of the comment refers to Section 3.6 of Appendix B.2 of the Draft EIR, specifically, the discussion directly following Exhibit 3-2 on page 3-7 of Appendix B.2. The commenter notes that there was no discussion of Taxiway C in this area of Section 3.6. As discussed in Section 3.4 of Appendix B.2 of the Draft EIR, the proposed Project included "Terminal 9, and associated taxiway/taxilane improvements." As further documented in Section 2.4.2.2 in Chapter 2 of the Draft EIR: "Other related airfield improvements … include the relocation of Vehicle Service Road C and the relocation and easterly extension of Taxilane C from Taxiway C3 to Taxiway B1." Therefore, although not specifically cited in the summary Section 3.6 of Appendix B.2 of the Draft EIR, the airfield simulations documented in Appendix B.2 reflected the extension of Taxiway C, and associated operational benefits. Notwithstanding, Section 3.4 of Appendix B.2 of the Draft EIR has been revised to clarify that "Terminal 9, and associated taxiway/taxilane improvements" includes the easterly extension of Taxiway C. Please see Chapter F3, Corrections and Clarifications to the Draft EIR.

ATMP-AL010-39

Comment: Indeed, controlling law recognizes that airport expansion projects that involve improvements to terminals (such as the proposed addition of Concourse 0 and Terminal 9 here) and airfield components (such as the proposed runway 6L/24R exits and Taxiway C and D extensions) must be fully analyzed for their effect on operations growth; the lead agency may not assume without evidence that such projects are not capacity-enhancing, as LAWA has done here. In *Barnes v. U.S. Department of Transportation*, the Ninth Circuit held that growth caused by projects that include runway expansion components must be analyzed "case-by-case." 655 F.3d 1124, 1139 (9th Cir. 2011). In so concluding the court rejected the FAA's assertion that growth would happen regardless

of the project. Id. at 1136-37. The court relied in part on an earlier FAA statement that a new runway is "the most effective capacity-enhancing feature an airfield can provide." Id. at 1138.

Not only does *Barnes'* statement that growth must be analyzed "case-by-case" undermine LAWA's unsupported assertion that the Project would not enhance capacity, but, similar to the FAA, here LAWA is also on record previously stating that runway or taxiway upgrades, or changes to arrival/departure procedures, "could, in some circumstances, entail changes in the number of operations that LAX can accommodate." Terminals 2 and 3 Modernization Project Final EIR at p. 2-31.[19] Despite making this statement on the record, LAWA has failed to do the work in this DEIR to show that the taxiway upgrades and associated changes to arrival/departure procedures proposed as part of the Project would not influence the number of operations that LAX can accommodate.

[19] Available at https://www.lawa.org/lawa-our-lax/environmental-documents/documents-certified/lax-terminal-2-and-3-modernization; last accessed Feb. 9, 2021.

Response: As documented in Section 3.4 of Appendix B.2 of the Draft EIR, the airfield simulation analyses conducted by LAWA's aviation experts incorporated all components of the proposed Project improvements, as listed by the commenter, including Concourse 0, Terminal 9, proposed new runway exits, and taxiway improvements. These improvements are depicted on Figure 2-4 in Section 2.3 of the Draft EIR.

The commenter cites *Barnes v. U.S. Department of Transportation* (2011) 655 F.3d 1124 (*Barnes*), a federal 9th Circuit Court of Appeals decision, for the proposition that "projects that include runway expansion components must be analyzed 'case-by-case.'" In *Barnes*, the petitioners challenged an FAA order concerning the proposed construction by the Port of Portland of an additional runway at Hillsboro Airport. The FAA had concluded that the new runway would not result in any significant environmental impacts pursuant to the National Environmental Policy Act (NEPA). The case did not concern any CEQA issues. The court in that case faulted the FAA's approach, finding that cases involving the construction of additional runways have "unique potential to create demand" and, thus, must be analyzed on a case-by-case basis. (Id., at 1139.) The court, therefore, ordered the FAA to consider the environmental impact of increased demand resulting from the additional runway. (Ibid.)

As a preliminary matter, the holding in *Barnes* is applicable to NEPA analyses and has no bearing on CEQA analyses. Further, unlike in *Barnes*, LAWA is not proposing a new runway. As documented in Section 2.3 of the Draft EIR, and assumed in the results documented in Section 3 of Appendix B.2 of the Draft EIR, the proposed Project airfield improvements are limited to improvements to runway exits and taxiways. These airfield improvements are nothing like the addition of an entire new runway, as occurred in *Barnes*. Thus, what the *Barnes* court characterized as a "unique potential to create demand" – specifically, the potential for increased demand that may accompany a proposed new runway – does not exist in this case.

Moreover, the Draft EIR includes a case-specific analysis of the potential operational impacts of the proposed Project improvements. This analysis is supported by airfield simulations of the proposed Project improvements conducted by LAWA's aviation experts Ricondo, as shown in Appendix B of the Draft EIR. The commenter's expert, Mr. Kanafani, acknowledged that the airfield simulations were conducted using industry standards and tools (see comment ATMP-AL010-205). See Responses to Comments ATMP-AL010-205 through ATMP-AL010-207 for further discussions regarding the results of the detailed airfield simulation analyses.

The commenter provides a partial quote from a response to comment provided by LAWA in the Terminals 2 and 3 Modernization Project Final EIR. The quote on page 2-31 of Terminals 2 and 3 Modernization Project Final EIR, in its entirety, states: "The proposed [Terminals 2 and 3 Modernization] project would not, however, affect or change any components, including the runways, taxiways, or aircraft arrival and departure procedures, all of which could, in some circumstances, entail changes in the number of operations that LAX can accommodate." This statement remains valid, with an emphasis on "in some circumstances."[1] Those circumstances are not present here. As explained in Appendix B of the Draft EIR and in Responses to Comments ATMP-AL010-205 through ATMP-AL010-207, the proposed LAX Airfield and Terminal Modernization Project would not result in increased activity levels at LAX.

The commenter is also incorrect that LAWA "failed to do the work in this DEIR to show that the taxiway upgrades and associated changes to arrival/departure procedures proposed as part of the Project would not influence the number of operations that LAX can accommodate." Appendix B.2 of the Draft EIR clearly documents the technical operational analyses for the proposed Project conducted by LAWA's aviation experts, which included the taxiway and runway exit improvements. Section 3.6 of Appendix B.2 of the Draft EIR clearly disclosed the difference in annualized average all-weather delay results between the proposed Project scenario and the No Project scenario. It also clearly documented how these differences in average delay results would not result in increased activity levels at LAX, as further documented in Responses to Comments ATMP-AL010-205 through ATMP-AL010-207.

Finally, contrary to the commenter's statement, the proposed Project does not include any changes in arrival and departure procedures, which are at the sole direction of the FAA's Air Traffic Control personnel.

[1] City of Los Angeles, Los Angeles World Airports, Final Environmental Impact Report for Los Angeles International Airport (LAX) Terminals 2 and 3 Modernization Project, (SCH 2016081034), Chapter 2 – Comments and Responses, page 2-31, June 2017. Available: https://www.lawa.org/lawa-our-lax/environmental-documents/documents-certified/lax-terminal-2-and-3-modernization.

ATMP-AL010-40

Comment: For the foregoing reasons, the DEIR has no basis to conclude that the Project's alleviating effect on airfield delay would not significantly affect LAX's operational capacity, and as a result, cause significant environmental impacts in future years. LAWA must correct these substantial flaws in the DEIR and recirculate the revised document for further public comment.

Response: Please see Responses to Comments ATMP-AL010-33 and ATMP-AL010-205 through ATMP-AL010-207 for a discussion of the relationship between the reduction in delay in certain operating conditions and future aircraft activity levels at LAX. Responses to related comments provided by the commenter are provided in Responses to Comments ATMP-AL010-31, ATMP-AL010-32, ATMP-AL010-34 through ATMP-AL010-39, ATMP-AL010-202 through ATMP-AL010-210, and Topical Response TR-ATMP-G-1. Please see Topical Response TR-ATMP-G-3 regarding the assessment of future environmental effects associated with the LAX Airfield and Terminal Modernization Project beyond the buildout year of 2028.

In preparing the Final EIR for the proposed Project, LAWA has reviewed all of the comments received, including the comments identified above, and has carefully considered the responses to these comments and other information provided in the LAX Airfield and Terminal Modernization Project Final EIR. None of the information provided in the Final EIR meets the criteria for recirculation of an EIR as outlined in Section 15088.5 of the State CEQA Guidelines.

ATMP-AL010-41

Comment: C. It Is Simply Common Sense that the Project Would Expand LAX's Operational Capacity.

As discussed above, the DEIR's failure to analyze the Project's effect on operational capacity, and the associated impacts from the increase in capacity, goes directly to CEQA's mandate that the lead agency provide substantial evidence for its conclusions; here, LAWA has failed to provide this evidence. However, as an additional matter, LAWA's claim that the Project would have no effect on operational capacity is simply not credible because it is common sense that a project of this size and scope would expand the airport's operational capacity; indeed, this is the Project's very purpose, as evidenced by LAWA's stated objectives.

The fact that LAWA is proposing to expand LAX to such an extent is itself evidence that this must enable and/or induce additional passenger operations, since otherwise pouring billions of dollars into a major overhaul of the terminals and airfield would be pointless. Merely improving existing passengers' "experience," when LAWA claims that demand will continue to rise at the same rate even if the Project were not built, does not make sense, unless it would also increase revenues and/or enable growth.

Response: Contrary to the commenter's assertion, the proposed Project would not expand LAX's operational capacity. The Draft EIR carefully analyzed and documented the analyses

associated with anticipated operational capacity limitations at LAX. As discussed in Section 6.3.2 of the Draft EIR, the overall operational capacity of an airport is influenced by each of the three key airport system components: airfield, terminal, and landside. The capacity limitation is set by whichever of the three system components is the most constrained, which, in the case of LAX, is anticipated to be the airfield (due to capacity limitations of the four-runway airfield system), and not the terminal or landside components. These statements are supported by analyses documented in Section 4 of Appendix B.1 of the Draft EIR, in which the airfield, terminal, and landside airport system components were reviewed.

Substantial evidence associated with the anticipated capacity constraints supports the Draft EIR's conclusions. Specifically, Appendix B of the Draft EIR includes facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts from LAWA's aviation experts, Ricondo, consistent with CEQA's definition of "substantial evidence." (See Section 15384 of the State CEQA Guidelines.) As documented in Section 3 of Appendix B.2 of the Draft EIR, the Draft EIR carefully analyzed the potential effects of the proposed Project improvements on aircraft operations and passenger demand. Based on this analysis, Section 3.6 of Appendix B.2 of the Draft EIR concluded that even though the proposed Project improvements provide an incremental benefit in the airfield east flow operating configuration (in the form of reduced airfield delays), the forecasted aircraft operations and passenger demand (and airline scheduling practices to meet such demand) remains the same with or without the proposed Project in 2028. Please see Response to Comment ATMP-AL010-205 for further discussion supporting this conclusion.

The commenter further suggests that LAWA's intent to increase operational capacity is evidenced by LAWA's stated objectives. The commenter did not provide a discussion of specific objectives or citations to the Draft EIR to support their assertion. Project objectives for the three main system components of the airport are documented in Section 2.3 of the Draft EIR, and summarized as follows:

- Airfield improvements: enhance safety of north airfield complex; reconfigure north airfield taxiway and runway exits and intersections to meet current Federal Aviation Administration (FAA) design standards; maintain or enhance airfield operational management; and provide additional flexibility for management of aircraft movements on the airfield.
- Terminal improvements: Provide for new modern, spacious, and efficient terminal facilities that support the ability to accommodate the projected future growth in passenger levels at LAX and do so in a manner that offers high-quality passenger service and operational flexibility.
- Roadway system improvements: In conjunction with providing landside (vehicle) access to the proposed new Terminal 9, develop a comprehensive network of roadway system improvements that will help separate and remove airport-related traffic from the local roadway system.

None of these objectives identifies expanded capacity as an objective for any of the proposed improvements as claimed by the commenter. The objectives adequately

describe the purpose for the improvements, and all elements of the proposed Project meet the stated objectives.

The commenter also suggests that the proposed Project improvements would not make financial sense unless they would also increase revenues and/or enable growth. There is no evidence to support this statement. As explained in Section 2.3 of the Draft EIR, the proposed Project would support the ongoing modernization of LAX, to provide excellent passenger service and experience (including reducing the inconvenience and inefficiency associated with busing passengers to and from the West Remote Gates), to support the economic growth and prosperity of the Los Angeles region, and to work closely with neighboring communities to reduce airport-related impacts. These improvements would help LAX to prepare early for the continued aviation growth that is projected by LAWA, SCAG, and the FAA to occur at LAX over the next several decades. Additionally, the nature and timing of improvements included in the proposed Project are integral to Los Angeles' plans to host the 2028 Olympic and Paralympic Games, with LAX serving as the main portal for athletes, dignitaries, and visitors from around the world. Additionally, a critical component of the proposed Project is to provide enhancements to airfield safety. The commenter's opinion that the purpose of the proposed Project is to enable growth for LAWA's financial benefit is, therefore, incorrect.

ATMP-AL010-42

Comment: Furthermore, evidence exists that major airlines see the Project as necessary to maintain and expand their passenger operations at LAX. In response to El Segundo's request pursuant to the PRA for documents relevant to airlines' purported "need" for the Project, LAWA provided documents stating that "[a]dditional gates [at proposed Concourse 0] will facilitate future growth and ease of operations" (Exhibit 9, June 19, 2019 Southwest Airlines Los Angeles Network Planning at p. 4), and that Concourse 0 is "necessary for [Southwest Airlines] to grow regionally" at an expected 3-5% growth rate in the Los Angeles Basin over the next 10-15 years, and that "much of th[is] growth will be at LAX because of constraints at surrounding airports." Exhibit 10, Southwest Airlines Terminal 1 East CDO & TDIP DED Briefing (January 15, 2020) at slide 4. The document goes on to state that Southwest Airlines growth will be "limited until additional gates" are added at the Southwest terminals and that "gate access limits growth." Id. This is due in part to the fact that Southwest is already operating at a very high utilization rate (10.9 turns/gate) and that as Southwest continues to increase flights it "will require more turn time at the gate for boarding/deplaning," and thus more gates. Id. In other words, Southwest, the intended occupant of Concourse 0, makes clear that it needs Concourse 0 in order to maintain and expand its passenger operations at LAX. Put another way, Southwest makes clear that airlines already understand the Los Angeles Basin airports as constrained, such that further growth at LAX will not occur unless LAWA proceeds with the projects to enhance LAX's capacity. This is consistent with common sense, but the DEIR is instead built on LAWA's nonsensical claim that such growth is inevitable.

This common sense principle about airport expansion is widely recognized. See, e.g., Bill Hethcock, "Dallas Fort Worth International Airport to Add Gates," Dallas Business Journal, Dec. 5, 2018[20] (stating 15 additional gates at repurposed concourse "will

support up to 100 additional flights a day"); Jeremy Hill, "U.S. Airports Spend Record Sums to Renovate Amid Travel Boom," Bloomberg News, July 2, 2018[21] (Airports Council president noting that "burst of building" is intended to "meet the demands of passenger growth"); Robert Silk, "More and More Airports Running Out of Space," Travel Weekly, June 17, 2018 ("Running Out of Space")[22] (Boyd Group International president noting "air traffic demand has a tendency to adjust to supply" and that, "as major airports fill up, flights often spill over to nearby, smaller airports").

[20] Available at https://www.bizjournals.com/dallas/news/2018/12/05/dallas-fort-worth-international-airport-to-add.html; last accessed Feb. 9, 2021.
[21] Available at https://www.bloomberg.com/news/articles/2018-07-02/travel-surge-has-airports-spending-on-renovation-at-record-pace; last accessed Feb. 9, 2021.
[22] Available at https://www.travelweekly.com/Travel-News/Airline-News/More-and-more-airports-running-out-of-space; last accessed Feb. 9, 2021.

Response: The Southwest Airlines presentations referenced by the commenter do not call LAWA's aviation activity forecast into question, as the commenter suggests, nor do they demonstrate that the proposed Project would stimulate growth or increase capacity at LAX. The fact that Southwest Airlines may increase its *share* of passenger operations at LAX does not mean that operations at LAX would increase overall. Further, these presentations were prepared by the airlines and their representatives based on the airline's perspective and after the activity forecasts for the LAX Airfield and Terminal Modernization Project Draft EIR were finalized in May 2019. Therefore, the Draft EIR did not rely on any of this information to support the technical analyses.

As documented in Section 3.2.2 of Appendix B.1 of the Draft EIR, passenger activity level forecasts were prepared for LAX, as a whole, as opposed to by airline. Similarly, the constrained demand scenario presented in Section 4 of Appendix B.1 estimated the anticipated changes that commercial passenger airlines operating at LAX would implement in anticipation of increased airfield congestion and delays, as a whole, as opposed to individually.

As stated in Section 4.4.4 of Appendix B.1, more than 65 individual commercial passenger airlines operated at LAX in the baseline year. Therefore, the 2028 Design Day Flight Schedules (DDFS) were prepared assuming that airline market shares (i.e., the share of total passengers or operations each airline accommodates) recorded in 2018 would remain relatively constant over the forecasting period through 2028, as documented in Section 1.3 of Appendix B.2 of the Draft EIR. Attempting to anticipate shifts in individual airline market shares in 10 years would be speculative. Please see Topical Response TR-ATMP-G-1 for information regarding the factors influencing airline schedules. As noted by the commenter, Southwest Airlines considers its overall network demand at other airports they serve in the Los Angeles basin (and associated flight scheduling decisions), which adds an additional level of complexity in attempting to project individual airline market shares. Like Southwest Airlines, American Airlines, Delta Air Lines and United Airlines all operate at other airports in the region.

The commenter is also incorrect that the presentations prepared and provided by Southwest Airlines show that other airports in the region are constrained and rely on LAX to provide additional capacity to continue to grow. Southwest Airlines' presentations are specifically related to Southwest Airlines' operations within the Los Angeles region, and do not represent overall commercial passenger operations at LAX relative to future activity levels. In such a dynamic and competitive market such as the Los Angeles market, airlines continuously seek to capture larger market shares to generate revenues by appealing to passengers with amenities and loyalty programs, adjusting flight schedule times for increased convenience, or by adjusting air fares to remain competitive, specifically when an airline like Southwest Airlines operates at many other airports in the region. The dynamic nature of the aviation industry is evidenced by the decision made by jetBlue Airways to cease operations at Long Beach Airport in October 2020. As a result, Southwest Airlines has worked with Long Beach Airport to claim flight slots vacated by jetBlue Airways, increasing their slot allowance.[1] In addition to its ability to operate at all major commercial airports in Southern California, this recent decision from Southwest Airlines to increase operations at Long Beach Airport contradicts the commenter's assertion that Southwest Airlines would not be able to grow unless LAWA builds Concourse 0.

The three news articles cited by the commenter in support of their assertion that providing additional gates creates capacity is a "common sense" principle do not support this conclusion. As further described below, the commenter's representations of those articles are either selective excerpts not presented within the full context of the article, or are not analogous to the operational characteristics of LAX or, in some cases, actually support the analysis approach reflected in the Draft EIR.

The first article is from the Dallas Business Journal and discusses improvements made to the Terminal E satellite concourse at Dallas Fort Worth International Airport (DFW). The article reads: "The airport plans to open a repurposed Terminal E satellite concourse next year with 15 gates that will be used by American Airlines for regional flights. Those gates will support up to 100 additional flights a day." This DFW project cannot be compared to the proposed Project at LAX for the following reasons. First, the Terminal E satellite concourse project discussed in this article was a renovation project (as stated in the article "repurposed") and not an expansion project as asserted by the commenter. Second, this facility is a regional carrier facility, to accommodate regional flights, which would operate differently than Concourse 0 or Terminal 9 under the proposed Project. Lastly, as published by DFW, American Airlines represented 85.9 percent passenger market share at DFW in December 2019[2].

The second article is from Bloomberg and discusses ongoing renovations at various airports throughout the United States. The article contains several statements consistent with the discussion provided by LAWA in response to many of the commenter's comments, including the discussion above. First, the Bloomberg article's title reads: "Travel Surge has Airports Spending on Renovation at Record Pace." Thus, the article discusses airports reacting to existing high demand by renovating their facilities. It further reads: "U.S. airports are spending record sums on construction to cash in on a surge in travel," which supports the assumption that airports renovate and expand to serve demand that already exists, as assumed in the Draft EIR.

The third article is from Travel Weekly and discusses worldwide airports which are slot-coordinated airports. Slot-controlled airports in the United States are designated by the Federal Aviation Administration as Level 3 airports with severe congestion. Under Level 3, the Federal Aviation Administration requires an airline to have a reservation to land and takeoff for a specific hour. The reservation for the hour is called a "slot." The article acknowledges that the United States does not have as many slot-controlled airports as other countries. The article mentions LAX as being a designated Level 2 airport. As defined by the Federal Aviation Administration, "Level 2 airports may have some periods when demand approaches one or more capacity limits, but a voluntary schedule-facilitation process prevents systemic delays."[3] LAX is under Level 2 management because of ongoing construction.

The commenter further cites the president of Boyd Group International (quoted in the Travel Weekly article) but does not cite the entire quote, which read as follows: "Not everyone in the aviation industry is as alarmed about the growth of slot-coordinated airports as IATA. Mike Boyd, president of the Boyd Group International consulting firm, said air traffic demand has a tendency to adjust to supply. For example, he explained, the U.S. market has adjusted to the consolidation of hubs that took place as a result of the spate of airline mergers over the past 15 years." When considering the quote in its entire context, it becomes obvious that this quote does not support the commenter's assertion that the proposed Project improvements would create demand that does not already exists. Mr. Boyd discussed air traffic demand in the context of slot-controlled airports, hubbing operations, and airline mergers.

Finally, the commenter cites an excerpt of the Travel Weekly article discussing the fact that "as major airports fill up, flights often spill over to nearby, smaller airports." As documented in Section 3.6 of Appendix B.2 of the Draft EIR, the forecasted aircraft operations and passenger demand (and airline scheduling practices to meet such demand) would not change as a result of the With Project improvements. Therefore, airlines operating at LAX may decide to increase operations at other airports in the Los Angeles Basin, as discussed above in the case of Southwest Airlines at Long Beach Airport, whether or not the proposed Project improvements are implemented. Mr. Boyd further said: "I don't think it is going to be something where if someone wants to get from Paris to Budapest, they won't be able to," Boyd said. "I don't see that happening. If supply is constrained, demand will adjust to it." This quote supports the analyses documented in the Draft EIR. As discussed in Section 4.4 of Appendix B.1 of the Draft EIR, it was assumed that airlines would make adjustments as LAX approaches the airfield's practical capacity of approximately 833,000 annual aircraft operations at 15 minutes of annualized average all weather delay. This is true whether the proposed Project improvements are implemented or not. As stated by Mr. Boyd, passenger demand would adjust to constraints (i.e., airfield constraints at LAX) and associated airlines' adjustments (increased seating capacity and load factors, as well as schedule adjustments). Passengers would still want to go from Paris to Budapest (to use Mr. Boyd's example).

The commenter also cited the president of the Airports Council but did not provide a source of the citation. The quoted words were not a part of the Bloomberg article.

Therefore, this information has not been adequately presented to LAWA and no response to this citation can be provided.

[1] Long Beach Press-Telegram, Southwest Takes Over As Dominant Airline at Long Beach Airport As JetBlue Prepares To Leave, September 2, 2020. Available: https://www.presstelegram.com/2020/09/02/southwest-takes-over-as-dominant-airline-at-long-beach-airport-as-jetblue-prepares-to-leave/.
[2] Dallas Fort Worth International Airport, Passenger Statistics for December 2019. Available: https://www.dfwairport.com/business/about/stats/.
[3] U.S. Department of Transportation, Federal Aviation Administration, Slot Administration – Slot Definition. Available: https://www.faa.gov/about/office_org/headquarters_offices/ato/service_units/systemops/perf_analysis/slot_administration/slot_definition/, accessed May 5, 2021.

ATMP-AL010-43

Comment: Furthermore, if as LAWA claims, the real constraint on LAX operations is and will continue to be the airfield, it would not be logical for LAWA to invest so heavily in more passenger gates. As the Kanafani Report notes, because "the capacity of the runway system is the limiting capacity of the airport, the increase in the number of gates with this Project to 177 and the resulting expansion of the terminal system capacity makes little business sense, were it not for the runway capacity increases expected from this Project." Kanafani Report at p. 4. Logically, it would make more sense to match up the number of gates with the anticipated airfield capacity—unless, as discussed in Part II.D, LAWA views its constrained demand forecast as relevant for only as long as it is needed for a particular expansion project, and subject to change (i.e., increase) whenever LAWA conducts a new demand forecast for its next expansion project.

Response: The commenter cites Mr. Kanafani's comments, which were included as an attachment to the comment letter. LAWA has responded in detail to Mr. Kanafani's comments, including those summarized here. Please see Responses to Comments ATMP-AL010-205 through ATMP-AL010-208.

ATMP-AL010-44

Comment: D. The Project and Its DEIR Are Part of LAWA's Sustained Pattern and Practice of Avoiding Disclosure of Impacts By Claiming that Projects Will Have No Effect on Aviation Growth.

As explained earlier, with this DEIR, LAWA is yet again claiming, without evidence, that a major airport expansion would have no effect on passenger/operational capacity, and future demand/capacity with the Project would be the same as future demand/capacity without the Project; thus the Project would effectively have no operational impacts. DEIR at pp. 6-4 and 6-5; see generally DEIR, Appendix B.1. In prior environmental documents LAWA has used this reasoning to justify concluding that projects' impacts were less than significant or nonexistent, whereas here, LAWA asserts that future impacts would be "significant and unavoidable" with or without the Project in 2028.

Despite this superficial difference, LAWA is still engaging in the same pattern and practice of avoiding a full environmental analysis as CEQA requires by treating aviation growth as inevitable. Moreover, here it is failing to disclose any operational impacts after 2028 based on the claim that any impacts in future years would occur regardless of the Project.

Notably, LAWA's current practice has not always been its approach to environmental review. Instead this practice has manifested in recent years as LAWA has attempted to shift away from the comprehensive development vision set out in its last long-range planning document for LAX—the 2004 Master Plan—and transitioned back to a "piecemeal," project-by-project approach to airport expansion.

In the late 1990s and early 2000s, LAWA undertook a Master Plan process to establish a long-term vision for LAX. When the Master Plan EIS/EIR was released in 2005, LAWA expected that by 2015, unconstrained passenger demand at LAX would be 97.9 MAP—nearly 40 MAP higher than actual passenger operations in 2005. LAWA stated that the Master Plan improvements would prevent the LAX airfield, terminals and roadways from experiencing "complete breakdown." LAX Master Plan FEIS/FEIR at p. 3-27. The Master Plan would also accommodate additional passenger demand:

As the existing facilities are used beyond their design capacity … increased congestion [will occur] within the passenger terminals, the various surface roads on and around the airport, and on the airfield itself. The consequences of taking no action to solve this problem will result in a loss of air service and declining economic benefits (jobs) to the Los Angeles region. Air service and economic benefits would likely relocate to other regions both within the state of California and to other states. Therefore, any comprehensive solution to meeting the regional demand for transportation over the next two decades must include improvements at LAX.

Id. at p. 1-34. Without the Master Plan improvements, airlines would "[s]hift connecting passengers to other airports in their networks." Id. at 2-9. More specifically, "[a]irlines will likely focus more of their LAX international air service on O&D [origin and destination] passengers and shift more of their connecting international passengers to other gateways in their network," thereby jeopardizing LAX's position as a leading airport for international connecting passengers. Id.

The Master Plan EIS/EIR extensively acknowledged the need to upgrade airport infrastructure and facilities to maintain LAX's standing as a world-class airport. Not only would expanding the runway systems enable passenger growth (id. at p. 3-58), but so would expanding the terminals by adding new passenger gates:

The airport's most limiting constraints are in the areas other than the airfield. The passenger terminal space and the number and size of the aircraft gates are inadequate to accommodate not only the number of passengers and aircraft, but also the large aircraft now being used and those that the airlines expect to introduce in the next couple of decades.

Id. at p. 2-7.

LAWA reasoned that although the Master Plan projects would enable LAX to accommodate an increase in passenger demand over then-current operations, the Master Plan would eventually limit passenger operations in 2015 to LAX's 2005 practical capacity of roughly 79 MAP. See id. at p. 3-57 ("Constraining the aircraft gate frontage at the terminals … place[s] an effective constraint on total passenger activity at LAX."); id. at p. 2-8 (LAX's "practical capacity acts as a barrier to growth in activity because airport users (airlines and passengers) will not tolerate excessive levels of delay or reduced levels of service. Over time, airport users will change their behavior."). LAWA assumed a level of operations of 79 MAP for the environmental impact analysis of the Master Plan project at buildout.

By 2015, neither passenger demand nor actual operations had quite reached the anticipated levels, possibly due to the effects of September 11 and the 2008 recession. Instead, actual operations came to just under 75 MAP. After 2015, however, passenger activity at LAX rose to nearly 90 MAP. Whereas in 2005 LAWA believed that limiting terminal capacity would effectively "cap" passenger operations, around 2012—in the final years before the Master Plan's 2015 horizon—LAWA began taking a different position toward the relationship between capacity and growth. Thus, despite stating in 2005 that terminal, airfield and curbside constraints directly limit passenger growth, LAWA's mantra today is that such improvements (perhaps with the unique exception of a new runway) have an insignificant effect on passenger growth because "enhancements in passenger convenience . . . are not primary considerations in passengers' decisions to travel to, or from, LAX, and how often they travel." LAMP Draft EIR at p. 6-8.[23]

In 2013, LAWA applied this theory to the MSC Program/MSC North Project, which in its first phase constructs a new, freestanding 15–passenger gate concourse west of TBIT, as well as the new Crossfield Taxiway C-14. MSC Program DEIR. LAWA claimed that the MSC North Project would "not increase passenger or gate capacity, nor flights and/or aircraft operations at LAX." Id. at p. 4.4-160. LAWA has furthermore claimed that the 8 additional gates that would be built in phase two of the MSC Program (i.e. MSC South) "would not increase operations at LAX, but would provide LAWA with the flexibility to accommodate existing demand."[24] Exhibit 6, Ricondo MSC South Memo.

In 2014, LAWA again took this approach with its Runway 6R/24L Runway Safety Area ("RSA") Project, which would among others things relocate the western physical end of Runway 6R approximately 200 feet to the east and shift the Runway 24L endpoint approximately 800 feet to the east. 6R/24L RSA Project Final MND.[25] LAWA claimed that the project "would not result in increased or decreased aviation activity at LAX" (id. at p. 4) "nor would it affect the number or type of aircraft that operate at LAX" (id. at p. 29).

In 2016, LAWA again took this approach with its Runway 7L/25R Safety Area Improvements and Pavement Rehabilitation Project, which would among other things extend the runway by 832 feet and repair the pavement on Taxiway B and the east end of Runway 25R/7L. 7L/25R RSA Project Final EIR.[26] LAWA claimed that the project "would not affect the number or type of aircraft operations at the airport." Id. at p. 2-15.

In 2016, LAWA again took this approach with its Terminal 1.5 Project, which among other things would add a new passenger processing building between Terminals 1 and 2 in order to "ease congestion" and provide "connectivity" between the two terminals. Terminal 1.5 Project Final MND.[27] LAWA claimed that the project "would not increase overall passenger capacity or affect aircraft operations at LAX." Id. at B-27.

In 2017, LAWA again took this approach with the Terminals 2 and 3 Modernization Project, which would double the square footage of Terminals 2 and 3 and add three new passenger gates. Terminals 2 and 3 Modernization Project Draft EIR.[28] LAWA claimed that "the proposed improvements to, and additional floor area proposed for, T2 and T3 would also not increase operations or passenger volumes beyond what would occur without the project." Id. at 2-27.

In late 2018, LAWA again took this approach with the United Airlines East Aircraft Maintenance and Ground Support Equipment Project, which would expand the existing eastern United aircraft maintenance area lease and "redevelop" approximately 38 acres for a new maintenance facility and additional aircraft parking positions, among other things. UAL East Aircraft Maintenance Draft EIR.[29] LAWA claimed that the project "would not increase flights and/or aircraft operations at LAX compared to existing airfield conditions and would not affect terminals, the number of gates at LAX, gate frontage, taxiways, or runways." Id. at p. 1-3.

In 2020, LAWA again took this approach with the Terminal 4 Modernization Project, which would among other things renovate/expand Terminal 4, realign Taxilane C9, and reconstruct the Terminal 4 apron area. Terminal 4 Modernization Project Final MND (available at https://www.lawa.org/lawa-our-lax/environmental-documents/current-projects/terminal-4-modernization-project; last accessed Feb. 9, 2021). LAWA claimed that the project "would not result in an increase in number of passengers or aircraft operations at LAX." Id. at 4-6.

In 2020, LAWA again took this approach with the Terminal 6 Renovation Project, which would among other things, realign the existing 13 aircraft gates and 1 bus gate to accommodate 15 aircraft gates and a new bus gate. Terminal 6 Renovation Project Final MND (available at https://www.lawa.org/lawa-our-lax/environmental-documents/current-projects/terminal-6-renovation-project; last accessed Feb. 9, 2021). LAWA claimed that the "reconfiguration proposed as part of the T6 Renovation project would not increase aircraft operations at LAX." Id. at 34.

By abandoning a forward-looking approach to airport development (i.e., establishing a target for LAX's practical capacity and basing environmental review on projected future operations, like LAWA did with the LAX Master Plan), LAWA is instead developing LAX in "piecemeal" fashion. LAWA justifies each expansion project with the claim that it will not cause operations growth and is needed merely to improve the "passenger experience." Yet, between 2010 and 2020, the number of annual aircraft operations at LAX grew by roughly one third. LAWA wants the public, and decisionmakers, to believe that this growth has nothing to do with the last 10 years of expansion at the airport. LAWA has taken the permanent position that no matter what it does at the airport,

LAWA never has to analyze a project's effect on operational capacity because capacity does not change as a result of LAWA's actions.

For reasons explained earlier, LAWA's position with regard to each project is neither credible nor backed by evidence, and thus violates CEQA.

[23] Available at https://www.lawa.org/en/lawa-our-lax/environmental-documents/current-projects/lamp-deir; last accessed Feb. 9, 2021.
[24] After approval of the original proposed 11-gate MSC North Project in 2014, in 2015 and 2016 LAWA added an additional 4 gates to the project with no CEQA notice to the public other than the 72-hour notice required under the Brown Act. MSC Addendum – Remote Transmitter/Receiver (RTR) Facility; MSC Addendum – North Extension and Gateway Facility (available at https://www.lawa.org/lawa-msc-north/project-documents; last accessed Feb. 9, 2021). See Part III, infra.
[25] Available at https://www.lawa.org/lawa-our-lax/environmental-documents/documents-certified/runway-6r24l-runway-safety-area-improvements-project; last accessed Feb. 9, 2021.
[26] Available at https://www.lawa.org/lawa-our-lax/environmental-documents/documents-certified/runway-7l-25r-runway-safety-area-and-associated-improvements; last accessed Feb. 9, 2021.
[27] Available at https://www.lawa.org/lawa-our-lax/environmental-documents/documents-certified/lax-terminal-15; last accessed Feb. 9, 2021.
[28] Available at https://www.lawa.org/lawa-our-lax/environmental-documents/documents-certified/lax-terminal-2-and-3-modernization; last accessed Feb. 9, 2021.
[29] Available at https://www.lawa.org/lawa-our-lax/environmental-documents/documents-certified/united-airlines-east-aircraft-maintenance; last accessed Feb. 9, 2021.

Response: Contrary to the commenter's assertion, there is no evidence that LAWA has failed to disclose the impacts of the proposed Project or any other project at LAX. The commenter's assertions regarding the Project impacts addressed in the Draft EIR are similar to the content of Comment ATMP-AL010-28; please refer to Response to Comment ATMP-AL010-28. In addition, please see Topical Response TR-ATMP-G-3 for a discussion of the reasons why 2028 is the appropriate horizon year for evaluating the impacts of the LAX Airfield and Terminal Modernization Project as well as a discussion of environmental conditions after 2028 with implementation of the proposed Project.

The commenter is incorrect that LAWA has changed its approach to environmental reviews from a "comprehensive development vision" based on a long-range planning effort to a "piecemeal" approach to "airport expansion." The long-range planning referred to by the commenter is the LAX Master Plan effort conducted by LAWA starting in the mid-1990s. In Section 101 of FAA Advisory Circular 150/5070-6B, Airport Master Plans,[1] the FAA defines a master plan as a comprehensive study of an airport, which describes the short, medium, and long-term development plans to meet projected aviation demand. As discussed in Section 202 of FAA Advisory Circular 150/5070-6B), updating or preparing a new master plan is at the discretion of the airport sponsor;

preparation and updating of an airport master plan are not required. Please also see Response to Comment ATMP-AL010-97 for additional discussion of airport master plans and LAWA's use of other planning tools to address anticipated growth at LAX. As explained therein, there is no evidence to suggest that LAWA has impermissibly "piecemealed" analysis of the proposed Project.

The commenter is also incorrect that project-specific environmental documents prepared by LAWA for individual projects that were evaluated after the adoption of the LAX Master Plan Final Environmental Impact Statement (EIS)/Environmental Impact Report (EIR) in 2004 represent piecemeal development. The required CEQA documentation was completed for each of the specific projects discussed by the commenter, including cumulative impact assessments based on considerations such as other reasonably foreseeable projects at the time. Each of the projects was, therefore, evaluated in accordance with CEQA requirements, including the evaluation of impacts of the individual projects combined. The commenter provides no evidence that the potential environmental effects of these projects, individually or collectively, were not adequately addressed in accordance with CEQA requirements. It should be noted that each of the projects referenced by the commenter was reviewed and approved by the Board of Airport Commissioners (BOAC) and no litigation was filed within the statute of limitations; therefore, pursuant to Public Resources Section 21167.2, the CEQA analyses and findings for each project are presumed to meet the requirements of CEQA.

Further, the fact that LAWA has updated the assumptions relied on in the 2004 LAX Master Plan related to growth and passenger activity does not suggest any nefarious purpose, as the commenter implies. To the contrary, it reflects LAWA's recognition and acknowledgment of actual conditions at LAX over the last 20 years. In the 2004 LAX Master Plan, LAWA evaluated facilities and potential constraints associated with the airfield, terminal, and landside components based on long-term forecasts of aircraft operations and passengers (up to 20 years between 1995 and 2015). Therefore, findings associated with potential capacity limitations documented in the LAX Master Plan were based on now-outdated assumptions and information from over 20 years ago. In contrast, the proposed LAX Airfield and Terminal Modernization Project is a project-level development project, and the analysis in the Draft EIR is based on the best available information today, taking into consideration empirical evidence of operations at LAX over the last 20 years. Since 1996, LAWA has observed that passenger volumes and operations have fluctuated with periods of economic growth and decline and due to other factors over which LAWA has no control (e.g., the events of September 11, 2001 and the 2008 recession). These events have resulted in conditions that are not consistent with the assumptions relied on in the 2004 LAX Master Plan. Rather than ignore this reality, the Draft EIR's aviation activity forecast recognizes the vast body of empirical data that demonstrates the lack of any significant correlation between improved airport facilities and increased passenger activity levels and, instead, relies on projected future increases in passenger activity levels forecasted by the FAA and SCAG. Please see Topical Response TR-ATMP-G-1 for further discussion of the factors influencing airlines' schedules and passenger demand and the validity of LAWA's aviation forecast.

As required under CEQA, the Draft EIR for the proposed Project carefully analyzed and documented the anticipated operational capacity limitations at LAX. As discussed in

Section 6.3.2 of the Draft EIR, the overall operational capacity of an airport is influenced by each of the three key airport system components: airfield, terminal, and landside. The capacity limitation is determined by whichever of the three system components is the most constrained, which, in the case of LAX and the planning horizon evaluated, is anticipated to be the airfield (due to capacity limitations of the four-runway airfield system), and not the terminal or landside components. These statements are supported by substantial evidence provided in Section 4 of Appendix B.1 of the Draft EIR, in which the airfield, terminal, and landside airport system components were reviewed, and Section 3 of Appendix B.2 of the Draft EIR, which clearly documents the potential impacts of the proposed Project improvements on airfield capacity, aircraft operations, and passenger demand. Section 3.6 of Appendix B.2 of the Draft EIR concludes, based on substantial evidence, that the forecasted aircraft operations and passenger demand (and airline scheduling practices to meet such demand) would be the same with or without the proposed Project in 2028. Please see Response to Comment ATMP-AL010-205 and Topical Response TR-ATMP-G-1 for further discussion supporting this conclusion.

The commenter references multiple environmental documents completed by LAWA subsequent to the certification of the LAX Master Plan EIS/EIR to support its assertion that LAWA changed its position related to capacity and passenger growth. The following discussion provides a summary of each project referenced by the commenter, as it relates to the project's potential effects on airport capacity and disproves the commenter's assertion.

- 2013 MSC Program/MSC North Project: As stated in the MSC EIR, the MSC North Project will give LAWA the flexibility to accommodate existing demand for aircraft gates while implementing maintenance and/or enhancements/modernization activities at other terminals.[2] The MSC North Project terminal and associated taxiway improvements will not result in an increase in airfield system capacity. Moreover, as described in Chapters 1 and 2 of the MSC EIR, the MSC project was a component of the LAX Master Plan and, as such, the improvements associated with the MSC project were accounted for in the LAX Master Plan analysis, including the ability of the Master Plan improvements to accommodate projected growth.
- 2014 Runway 6R-24L Runway Safety Area Project: The commenter incompletely quotes page 4 of the Runway 6R-24L Runway Safety Area Final Negative Mitigation Declaration and Initial Study (Runway 6R-24L RSA Project IS/MND) with respect to future aviation activity at LAX with implementation of the project. The entire statement, with the omitted text provided in italics, is crucial to the conclusions provided in the Final IS/MND: "The proposed Project would not result in increased or decreased aviation activity at LAX *compared to existing conditions, and would not increase usable runway length or move the runway north or south*."[3] Response to Comment 6R-24L_RSA-PC00002-4 of the Runway 6R-24L RSA Project IS/MND documented the fact that these improvements did not include any changes to the runway system that will result in an increase in airfield capacity or its ability to accommodate more aircraft.
- 2016 Runway 7L-25R RSA Project: As stated on page 2-8 in Chapter 2 of the Runway 7L-25R RSA and Associated Improvements EIR, the extension of Runway 7L increased its physical length by 832 feet to the west without changing the landing threshold

location, and allows pilots to begin their takeoff roll to the east in conjunction with declared distances.[4] As further stated in Section 2.4.1.1 on page 2-6 of the Runway 7L-25R RSA and Associated Improvements EIR, the declared distances were kept the same as distances prior to the improvement; therefore, the runway length available to a pilot did not increase with implementation of this project. Because the available length of the runway landing and takeoffs did not change, the runway's ability to accommodate operations did not change; therefore, the project did not increase capacity of the airfield.

- 2016 Terminal 1.5 Project: As documented in Section 5 of Attachment A of the LAX Terminal 1.5 Project IS/MND, the project will not add any new gates, and will actually eliminate one gate (Gate 10) at Terminal 1. The analysis assumed that flights previously assigned to the gate would be rescheduled or reassigned to nearby gates. There will be no other changes to Terminal 1 and 2 operations.[5] In addition, the project will not change components of the airfield that would affect the capacity of the airfield system.
- 2017 Terminals 2 and 3 Modernization Project: As stated in Section 6.3.1 of the Terminals 2 and 3 Modernization Project EIR, "…the proposed project would not alter the airspace traffic, runway operational characteristics, or the practical capacity of the airport; therefore, the proposed project will not increase the number of daily flights arriving and departing from LAX or the growth in aviation activity at LAX that is projected to occur in the future."[6] Section 2.6 of the Terminals 2 and 3 Modernization Project EIR describes the reasoning and evidence as to why the modernization of the terminals and the additional gates will not change the air traffic operations on the airfield (i.e., because route and runway assignments will not change), and why the passenger demand levels will not change (i.e., because the overall terminal linear footage will not change with implementation of the project).[7] The evidence was further described in Topical Response TR-T2/3-1, of the Terminals 2 and 3 Modernization Project EIR.[8]
- 2018 United Airlines (UAL) East Aircraft Maintenance and Ground Support Equipment Project: Section 6.3.1 of the UAL East Aircraft Maintenance and Ground Support Equipment Project EIR states that "[t]he proposed project would consolidate and modernize existing UAL aircraft maintenance and GSE facilities at LAX, which would allow for more efficient and effective maintenance of existing aircraft and GSE at the airport. Although the portion of UAL's current aircraft and GSE maintenance operations that occurs at the West Maintenance Facility would be consolidated with operations located on the east side of the airport, the volume and basic nature of UAL's existing maintenance operations at LAX would not change or increase."[9] In addition, the project will not increase the available maintenance space as a means to conduct more aircraft maintenance. The project was "right sized" for current operation plans for United Airlines. As documented, this project will not change any of the airport system components that could affect capacity. As stated in the passage quoted by the commenter, this project will not affect terminals, number of gates, gate frontage, taxiways, or runways.
- 2020 Terminal 4 Modernization Project: Section 2.1 of Terminal 4 Modernization Project Negative Declaration and Initial Study described that the purpose of the project is to improve passenger level of service, accommodate modern aircraft fleets and operation support equipment, and provide seismic resiliency and structural

safety. The project will not increase the existing number of aircraft gates at Terminal 4 or result in a change in aircraft operations.[10]

- 2020 Terminal 6 Renovation Project: As described in the Chapter 1 of the LAX Terminal 6 Renovation Project Initial Study/Negative Declaration, the improvements are designed to remedy existing known deficiencies in levels of service and passenger experience, operations and building systems.[11] The project includes the realignment of the existing 13 gates at Terminal 6 to accommodate 15 gates and a new bus gate; however, the project will not increase the linear frontage beyond that currently available to accommodate aircraft parking.[12] These improvements will allow for reconfiguring the gate positions and aircraft-parking layout around Terminal 6 without changing the existing linear frontage, terminal apron area, or the existing parking limit lines to match existing and forecasted aircraft size requirements.[13] Because the apron area, parking limit lines, and linear frontage will not change, there will continue to be a constraint where aircraft can park at Terminal 6 in the future with implementation of the project.[14] Accordingly, the Terminal 6 improvements will not increase operations at LAX.

In summary, the projects identified by the commenter and discussed above, individually or together, will not affect the capacity of the airfield system component, which has been documented to be the constraining component in the LAX Airfield and Terminal Modernization Project Draft EIR. Each project cited by the commenter was evaluated pursuant to CEQA requirements and was assessed with respect to the specific goals and objectives that each project was designed to address. CEQA does not require a project to evaluate long-range planning horizons unless a project is expected to be implemented, as a whole, in the long-term, which was the nature of the LAX Master Plan.

The commenter further asserts a connection between the historical growth in aircraft operations between 2010 and 2020 and the referenced projects, and contends that this growth is due to "the last 10 years of expansion at the airport." However, as acknowledged by the commenter in Comment ATMP-AL010-52, "neither the LAX airfield, nor the airport's operating procedures, has materially changed since 2016." In addition, no major terminal or landside improvements were completed between 2015 and 2019. Yet passenger activity levels at LAX grew at a sustained compounded annual growth rate of 4.1 percent between 2015 and 2019. This was the result of natural passenger growth, unrelated to any LAX improvements.[15] In fact, with the exception of the RSA improvements, the projects referenced by the commenter have not been completed (or have become operational only very recently in the case of the MSC North project) and, therefore, could not have possibly contributed to growth in aircraft operations between 2010 and 2020, as asserted by the commenter.

In sum, LAWA has not, as the commenter asserts, taken a permanent position that, no matter what LAWA does at the airport, it will not impact the capacity of the airport. The commenter provides no evidence of this assertion, and the analysis and evidence documented in Appendix B.2 of the Draft EIR disproves the commenter's statement. As projects at LAX are proposed, LAWA has and will continue to evaluate the potential effects of such projects on a case-by-case basis in reliance on the best available information and data at the time. This approach is consistent with CEQA and results in a

good-faith analysis of the potential environmental impacts associated with proposed projects.

[1] U.S. Department of Transportation, Federal Aviation Administration, Advisory Circular 150/5070-6B, Change 2, Airport Master Plans, January 27, 2015. Available: https://www.faa.gov/airports/resources/advisory_circulars/index.cfm/go/document.information/documentID/22329.
[2] City of Los Angeles, Los Angeles World Airports, Final Environmental Impact Report for Los Angeles International Airport (LAX) Midfield Satellite Concourse, (SCH 2013021020), Chapter 2 - Description of the Proposed Project, page 2-5, June 2014. Available: https://www.lawa.org/en/lawa-msc-north/project-documents.
[3] City of Los Angeles, Los Angeles World Airports, Final Mitigated Negative Declaration and Initial Study (IS/MND) for the Los Angeles International Airport (LAX) Runway 6R-24L Runway Safety Area (RSA) Improvements Project: Volume 5: Responses to Comments and Corrections/Additions to the Draft IS/MND, page 4, May 2015. Available: https://www.lawa.org/lawa-our-lax/environmental-documents/documents-certified/runway-6r24l-runway-safety-area-improvements-project.
[4] City of Los Angeles, Los Angeles World Airports, Final Environmental Impact Report for Los Angeles International Airport (LAX) Runway 7L/25R Runway Safety Area (RSA) and Associated Improvements Project, (SCH 2012101019), Chapter 2 – Project Description, January 2014. Available: https://www.lawa.org/en/lawa-our-lax/environmental-documents/documents-certified/runway-7l-25r-runway-safety-area-and-associated-improvements.
[5] City of Los Angeles, Los Angeles World Airports, Final Mitigated Negative Declaration and Initial Study for Los Angeles International Airport (LAX) Terminal 1.5 Project, (Los Angeles City File No. NG-16-275-AD), Attachment A – Project Description, page A-16, November 2016. Available: https://www.lawa.org/en/lawa-our-lax/environmental-documents/documents-certified/lax-terminal-15.
[6] City of Los Angeles, Los Angeles World Airports, Final Environmental Impact Report for Los Angeles International Airport (LAX) Terminals 2 and 3 Modernization Project, (SCH 2016081034), Section 6.3.1 – Project Characteristics, page 6-3, June 2017. Available: https://www.lawa.org/en/lawa-our-lax/environmental-documents/documents-certified/lax-terminal-2-and-3-modernization.
[7] City of Los Angeles, Los Angeles World Airports, Final Environmental Impact Report for Los Angeles International Airport (LAX) Terminals 2 and 3 Modernization Project, (SCH 2016081034), Section 2.6 – Operations, pages 2-24 to 2-27, June 2017. Available: https://www.lawa.org/en/lawa-our-lax/environmental-documents/documents-certified/lax-terminal-2-and-3-modernization.
[8] City of Los Angeles, Los Angeles World Airports, Final Environmental Impact Report for Los Angeles International Airport (LAX) Terminals 2 and 3 Modernization Project, (SCH 2016081034), Chapter 2 – Comments and Responses, Topical Response TR-T2/3-1: Apron and Gate Dependencies, pages 2-1 to 2-15, June 2017. Available: https://www.lawa.org/en/lawa-our-lax/environmental-documents/documents-certified/lax-terminal-2-and-3-modernization.
[9] City of Los Angeles, Los Angeles World Airports, Final Environmental Impact Report for Los Angeles International Airport (LAX) United Airlines East Aircraft Maintenance and Ground Support Equipment Project, (SCH 2017121019), Section 6.3.1 – Project Characteristics, page 6-3, October 2018. Available: https://www.lawa.org/en/lawa-our-

lax/environmental-documents/documents-certified/united-airlines-east-aircraft-maintenance.
[10] City of Los Angeles, Los Angeles World Airports, Final Negative Declaration for the Los Angeles International Airport (LAX) Terminal 4 Modernization Project, Section 2 – Project Description, page 2-1, July 2020. Available: ttps://www.lawa.org/lawa-our-lax/environmental-documents/current-projects/terminal-4-modernization-project.
[11] City of Los Angeles, Los Angeles World Airports, Initial Study and Negative Declaration for the Los Angeles International Airport (LAX) Terminal 6 Renovation Project, Chapter 1, January 2020. Available: https://www.lawa.org/-/media/lawa-web/lawa-our-lax/t6-renovation/lax-t6_renovation_draft_nd.
[12] City of Los Angeles, Los Angeles World Airports, Initial Study and Negative Declaration for the Los Angeles International Airport (LAX) Terminal 6 Renovation Project, page 33, January 2020. Available: https://www.lawa.org/-/media/lawa-web/lawa-our-lax/t6-renovation/lax-t6_renovation_draft_nd.
[13] City of Los Angeles, Los Angeles World Airports, Initial Study and Negative Declaration for the Los Angeles International Airport (LAX) Terminal 6 Renovation Project, pages 33 to 34, January 2020. Available: https://www.lawa.org/-/media/lawa-web/lawa-our-lax/t6-renovation/lax-t6_renovation_draft_nd.
[14] City of Los Angeles, Los Angeles World Airports, Initial Study and Negative Declaration for the Los Angeles International Airport (LAX) Terminal 6 Renovation Project, page 34, January 2020. Available: https://www.lawa.org/-/media/lawa-web/lawa-our-lax/t6-renovation/lax-t6_renovation_draft_nd.
[15] City of Los Angeles, Los Angeles World Airports, 10-Year Summary of Passengers. Available: https://www.lawa.org/lawa-investor-relations/statistics-for-lax/10-year-summary/passengers, accessed May 14, 2021. 2015: 74,956,305 passengers; 2019: 88,068,013 passengers.

ATMP-AL010-45

Comment: Further, LAWA's strategy of avoiding full CEQA review for all of these projects, including the ATMP, is aided by the fact that LAWA systematically ignores the cumulative effect of all of these projects on operational capacity. Although each environmental document cited in the list above contained a cumulative impacts discussion pursuant to CEQA, none of these documents discussed these and other past, present and future projects' cumulative effect on aircraft operations, which have direct, calculable impacts on the environment. This also violates CEQA. Were this cumulative effect properly analyzed and disclosed, the environmental impacts from the last 10 years of expansion, as well as from the Project, could be properly evaluated.[30]

LAWA has avoided looking at its expansion efforts' cumulative effect on aircraft operations by steadfastly refusing to update the 2004 LAX Master Plan. See Part V.F. Airport development is a long-range planning process; airports do not come up with each successive project in a vacuum. Yet, by avoiding updating its Master Plan, and by ignoring the individual and cumulative effect of projects' impacts on operations, LAWA has effectively "piecemealed" a decade of capital improvement projects in order to avoid disclosing their true impact on the surrounding communities and the environment.

In sum, LAWA has been engaging in an illegal pattern and practice of avoiding disclosure of projects' true operational impacts, in violation of CEQA. The Project is the latest example of LAWA's systematic effort.

[30] Of particular note, the DEIR fails to identify the United Airlines East Aircraft Maintenance and Ground Support Equipment Project (which, according to its associated EIR, would now be nearly built) in its analysis of cumulative impacts; similarly, the cumulative impacts analysis for that project ignored the ATMP. The omission of the ATMP from that analysis violated CEQA; as documentary evidence cited throughout these comments makes clear, LAWA's planning for the ATMP was already well underway at that time (late 2018), and thus the Project was reasonably foreseeable. Furthermore, given El Segundo's proximity to United's southern airfield operations, we are concerned about LAWA's failure ever to undertake a comprehensive analysis of the gradual expansion of United's aviation, maintenance and related operations in the southeastern portion of the airport, including but not limited to the cumulatively considerable air quality and other impacts from the United project's substantial grading. LAWA's failure to do this violates CEQA.

Response: Please see Response to Comment ATMP-AL010-44 regarding the CEQA documentation completed by LAWA for previous projects at LAX. As noted in that response, required CEQA documentation was completed for each of the specific projects discussed by the commenter, including cumulative impact assessments based on considerations such as other projects that were reasonably foreseeable at the time. Each of the projects was, therefore, evaluated in accordance with CEQA requirements, including the evaluation of impacts of the individual projects combined. The commenter provides no evidence that the potential environmental effects of these projects, individually or collectively, were not adequately addressed in accordance with CEQA requirements. It should be noted that each of the projects referenced by the commenter was reviewed and approved by the Board of Airport Commissioners (BOAC) and no litigation was filed within the statute of limitations; therefore, the CEQA analyses and findings for each project are presumed to meet the requirements of CEQA.

The operational analysis conducted for the LAX Airfield and Modernization Project Draft EIR considered past, present, and reasonably foreseeable facility changes at the airport that would affect how aircraft operations are accommodated. For example, as shown in Table 2-1 of Appendix B.2 (and illustrated in Exhibits 2-1 through 2-3), the analysis of future conditions both with and without implementation of the proposed Project reflects the changes in the number of gates at Terminals 1, 2, 3, 5, and 6 that will occur with completion of various terminal improvement projects, as well as the addition of both the MSC North and MSC South projects and the planned relocation of American Eagle's operations from their current location to MSC South. The future gate configuration was an essential component of the operational analysis documented in Appendix B.2 of the Draft EIR (i.e., the gating and airfield simulation analyses). Please also see Topical Response TR-ATMP-G-2 regarding the Draft EIR's assumptions regarding the MSC, including the planned relocation of American Eagle's operations.

The commenter's assertions regarding the need to prepare a Master Plan are similar to comments raised in comments ATMP-AL010-44 and ATMP-AL010-197; please refer to Responses to Comments ATMP-AL010-44 and ATMP-AL010-197.

With regards to the commenter's assertions regarding the United Airlines (UAL) East Aircraft Maintenance and GSE Project, as stated in Section 2.3.1 of that project's EIR, the UAL project will consolidate and modernize existing UAL aircraft maintenance and GSE facilities at LAX, which, in turn, will allow for more efficient and effective maintenance of existing aircraft and GSE at the airport. Consolidation of the maintenance facilities will eliminate duplicate maintenance facilities and operations and will place all of UAL's maintenance activities in closer proximity to its gates in Terminals 7 and 8. The UAL project will reduce the total distance that UAL aircraft currently travel between the gates and the maintenance facilities and will eliminate vehicle trips between the two maintenance facilities. The commenter provides no evidence that the LAX Airfield and Terminal Modernization Project, in combination with the UAL East Aircraft Maintenance and GSE Project, would result in any cumulative environmental impacts. The UAL project will reduce the amount of space that UAL has historically had to conduct maintenance activities at LAX. The total square footage of UAL's maintenance operation will decrease from 728,800 square feet to 411,000 square feet and the number of aircraft parking positions available for aircraft requiring or undergoing maintenance will be reduced from 32 to 22.[1] This project will not enhance operational capacity at LAX or contribute to a growth in airfield operations. Moreover, the UAL project will not place maintenance activities in closer proximity to the City of El Segundo than the facilities located on the west side of the airport. As noted by the commenter, the UAL project is nearly complete. The grading that was conducted as part of that project, and any environmental impacts attendant to that grading, will not overlap with construction of the LAX Airfield and Terminal Modernization Project. Therefore, no cumulative impacts from the UAL project and the LAX Airfield and Terminal Modernization Project with respect to grading or other construction activities would occur. For these reasons, the Draft EIR property analyzed cumulative environmental impacts.

The commenter's assertions regarding the consolidation of UAL's operations are not related to the LAX Airfield and Terminal Modernization Project Draft EIR. As noted above, the UAL East Aircraft Maintenance and GSE Project EIR was reviewed and approved by BOAC and no litigation was filed within the statute of limitations; therefore, the CEQA analyses and findings for that project are presumed to meet the requirements of CEQA.

[1] City of Los Angeles, Los Angeles World Airports, Final Environmental Impact Report for Los Angeles International Airport (LAX) United Airlines East Aircraft Maintenance and Ground Support Equipment Project, (SCH 2017121019), Chapter 2 – Project Description, October 2018. Available: https://www.lawa.org/en/lawa-our-lax/environmental-documents/documents-certified/united-airlines-east-aircraft-maintenance.

ATMP-AL010-46

Comment: E. The DEIR Contains No Evidence that the Project Would Not Remove Ground Access Constraints to Passenger/Operations Growth, Including After 2033.

As El Segundo has emphasized to LAWA before, the environmental analysis required by CEQA may not simply assert that alleviating the significant and longstanding ground access constraints at LAX will have no effect on airport operations. See DEIR, Appendix B.1 at p. 4-6 (claiming that airport roadway congestion does not present an obstacle to passenger growth).

The DEIR ignores this effect of the Project by claiming that the landside component is expected to be able to accommodate passengers in FY 2028 and FY 2033; moreover, the DEIR simply assumes this will continue to be the case after 2033. DEIR, Appendix B.1 at p. 4-6. Yet the DEIR fails to provide substantial evidence for these assumptions. In the CEQA context, substantial evidence means "enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached. . . . Argument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate . . . does not constitute substantial evidence." CEQA Guidelines § 15384(a).

The DEIR asserts that ground access has no bearing on airport capacity, thereby attempting to portray the role of ground access in passenger operations in black and white. This mischaracterizes what is in fact a very complex issue, particularly at LAX. As Adib Kanafani explains in his memorandum prepared in connection with the LAMP DEIR (Exhibit 11, 2016 Kanafani Comments on LAMP Ground Access), LAWA failed to support the assertion that the LAMP would not enable any portion of the projected growth in passenger capacity. As the 2016 Kanafani Comments described, each component of the airport, including the passenger terminals, the airfield, and the ground access system, is a "link in a chain," and the link with the lowest capacity "determines the capacity of the whole system." Id. at p. 1. Passengers, in particular domestic travelers who have a variety of other options in the LA region for airports that provide domestic flights, take traffic congestion (along with other factors) into account when they choose an airport, particularly when congestion gets very high.

Indeed, the data cited in the ATMP DEIR's discussion of this issue states that ground access does play a role in prospective passengers' decisionmaking, thereby contradicting the assertion that removing ground access constraints will not enable passenger growth. See DEIR, Appendix B.1 at 4-6 (citing report of the Transportation Research Board of the National Academies, Airport Cooperative Research Program, which finds that that "[s]urface access issues . . . remain[] a primary passenger choice driver in the Los Angeles Basin. Given the presence of several regional facilities across the area, the traffic situation in the Basin drives the airport choice for a large proportion of travelers."). Other sources echo this finding; a 2013 report by the Eno Center for Transportation ("Eno Report") finds that "[g]round access to the airport at LAX is the most significant chokehold in the airport's system and according to [LAWA] airport access infrastructure was projected to hit complete gridlock at 78.9 million annual passengers without improvements to the system." 2013 Eno Report at p. 18.[31] Similarly, the Southern California Association of Governments ("SCAG") 2040 Regional Transportation

Plan/Sustainable Communities Strategy ("2040 RTP/SCS") states that "[p]assengers' choice of airports is based in part on the travel time to the airport and the convenience of access, so facilitating airport access is essential to the efficient functioning of the aviation system." Exhibit 12, 2016-2040 RTP/SCS Aviation & Airport Ground Access Appendix at p. 22.

LAWA itself has previously asserted that the ground access system is a significant constraint on passenger operations at LAX, and that it would need to be relieved to enable growth in passenger operations. The 2004 Master Plan, which considered an unconstrained demand forecast of 98 MAP in 2015 and evaluated four alternative plans under this demand scenario, stated that the No Action/No Project Alternative (i.e., no Master Plan adopted) would limit passenger operations at LAX to 78 MAP because of the airport's "constrained curbs and roadways." LAX Master Plan FEIR/FEIS at Figure 1.2-1. By contrast, the alternatives that included LAMP components would have permitted up to 98 MAP. Id.; id. at 1-4 ("The [No Project] Alternative is limited by the capacity of the curbfront in the Central Terminal Area ("CTA") where passengers are dropped off and picked up in front of the existing terminals. The resulting annual passenger performance measure of this alternative is approximately 78 million.").

Although this evidence directly contradicts LAWA's assertion that the proposed removal of ground access constraints with the Project will not contribute to the higher passenger forecast at LAX in the forecast years, the DEIR does not accurately disclose the relationship between ground access and aircraft operations. LAWA's counterargument that ground access simply is not a constraint on airport capacity, and therefore improving ground access efficiency would not affect airport capacity or operations, is incorrect and not supported by substantial evidence in the record. As a result, the DEIR fails to justify its omission of analysis of environmental impacts related to higher passenger operations enabled by the Project, including increased aviation noise, traffic, air quality and GHG impacts.

[31] Available at www.ustravel.org/sites/default/files/media_root/USTravel_Eno_1.pdf; last accessed Feb. 9, 2021.

Response: The commenter disagrees with the findings documented in Section 4.3 of Appendix B.1 of the Draft EIR that the landside component of LAX was found to not represent a limitation to accommodating passengers in 2028. Contrary to the commenter's assertion, the Draft EIR did not ignore the potential effects of the proposed Project landside improvements, as further discussed below. In addition, the commenter also incorrectly asserts that the Draft EIR assumed that the landside component improvements would not represent a constraint at LAX after 2033. As previously discussed, 2028 represents the buildout year of the proposed Project improvements and was, therefore, selected as the horizon year. Please refer to Topical Response TR-ATMP-G-3 regarding the selection of the horizon year for impact analyses for the LAX Airfield and Terminal Modernization Project Draft EIR.

The Draft EIR provides substantial evidence to support the conclusions that the landside component would not represent capacity limitations to accommodate demand in 2028.

As documented in Section 4.3 of Appendix B.1, LAX has historically dealt with vehicle congestion inside the Central Terminal Area (CTA) and surrounding roadways. Yet, passenger activity at LAX increased at a 4.9 percent compounded annual growth rate (CAGR) between 2009 and 2017, suggesting no empirical correlation between historical passenger activity levels and congested roadway conditions.[1] These facts, including the other reasonable assumptions documented in Section 4.3 of the Appendix B.1 (further discussed below), supported the conclusion made by LAWA's aviation experts that the airfield system component at LAX would represent potential capacity limitations before the landside component would, within the period of time analyzed by the Draft EIR (see Section 4 of Appendix B.1 of the Draft EIR).

The commenter is also incorrect that the Draft EIR concluded that the landside component "has no bearing on airport capacity." Contrary to the commenter's assertion, the Draft EIR discussed all airport components that can potentially represent capacity limitations. As discussed in Section 6.3.2 of the Draft EIR, the overall operational capacity of an airport is influenced by each of the three key airport system components: airfield, terminal, and landside. The capacity limitation is set by whichever of the three system components is the most constrained, which, in the case of LAX, is anticipated to be the airfield (due to capacity limitations of the four-runway airfield system), and not the landside component, as documented above.

The commenter cites a comment letter written by Adib Kanafani regarding the LAX Landside Access Modernization Program Draft EIR released in September 2016. Mr. Kanafani provided the analogy of a "link in a chain" in the context of discussing how the airport component with the lowest capacity (i.e., with limitations in their ability to accommodate aircraft operations and passengers) determines the overall airport capacity. This analogy is appropriate and is consistent with the discussion provided in the Draft EIR, as discussed in the previous paragraph above.

The fact that the Draft EIR acknowledges that ground access plays a role in prospective passengers' decision-making is not inconsistent with its conclusion that removing ground access constraints will not enable passenger growth. The Airport Cooperative Research Program (ACRP) Report 98 cited by the commenter is also cited in Section 4.3 of Appendix B.1 of the Draft EIR to discuss factors that influence the decision of travelers to choose to fly out of a specific airport in a regional setting that provides multiple airport options, such as the Los Angeles region. LAWA does not refute the fact that landside access congestion is a factor that passengers consider when deciding to use LAX. However, as discussed in Section 4.3 of Appendix B.1 of the Draft EIR, it is not the only factor, as documented in ACRP Report 98. Section 4.3 of Appendix B.1 clearly states that "airport roadway congestion has not presented an obstacle to passenger growth", as also discussed above. ACRP Report 98 further discusses the fact that other airports in the region provide less nonstop service than LAX, "often presenting passengers with deciding between a more reasonable drive time vs. substantially more diverse nonstop air service offerings".[2] Accordingly, in addition to roadway congestion, passengers considers the following factors when deciding which airport to use: airfares, flight frequency, accessibility, nonstop flights, airline loyalty programs, previous experience at an airport, group travel, aircraft type, and flight time.[3] The ACRP Report 98 further

notes: “Coupled with each of these factors is the matter of trip purpose (leisure or business), which may be the single largest determinant of airport choice.”[4]

The 2013 report by the Eno Center for Transportation cited by the commenter is not reflective of actual conditions at LAX. This report asserts that the landside component is the “most significant chokehold in the airport’s system” and that LAX would need to make improvements to be able to accommodate 78.9 MAP as documented in the LAX Master Plan. The LAX Master Plan was based on the best available data at the time. Since that time, however, empirical evidence has demonstrated that the ground access system does not constrain passenger operations in the manner assumed in the LAX Master Plan. For example, despite significant congestion in the CTA, LAX accommodated 88 MAP in 2019, and regularly experiences traffic in excess of the projected capacity of the curb and roadways component identified in the 2004 LAX Master Plan. Thus, the current evidence indicates that the capacity of the existing curb and roadways component of the LAX system is greater than previously considered and that LAX passenger activity levels can and have exceeded 78.9 MAP despite the currently constrained and congested ground access conditions. These conclusions were documented in LAX Landside Access Modernization Program Final EIR,[5] which was finalized after the Eno Report was published and was certified as being adequate and in compliance with CEQA requirements.

The commenter also cites the 2016-2040 Regional Transportation Plan/Sustainability Communities Strategy (RTP/SCS) published by the Southern California Association of Governments (SCAG), which was published April 2016, and has now been superseded by the 2020-2045 RTP/SCS released in May 2020. The latest RTP/SCS states: “one can reasonably conclude that air passengers are venturing out of their counties and catchment areas (i.e. geographic area from which passengers are drawn to the air services of an airport) to other airports, most notably Los Angeles International Airport. The primary factors for airport choice, besides proximity, include the number of airlines and flight options, and the price of airfare.”[6] This provides additional evidence that ground access congestion is one of many factors considered by passengers when deciding which airport to use, but not the most significant factor that would lead passengers to only select one airport based on traffic congestion patterns.

As discussed above, and contrary to the commenter’s assertions, the Draft EIR documented facts and reasonable assumptions regarding the fact that the landside component would not be a constraint before the airfield system component by 2028 (as discussed in Section 4.3 of Appendix B.1 of the Draft EIR). Similarly, contrary to the commenter’s assertion, LAWA did not state that the landside component “would not affect airport capacity” (as discussed earlier in this response to comments). Furthermore, as discussed above, and contrary to the commenter’s assertion, appropriate substantial evidence has been provided in Appendix B.1 of the Draft EIR to support the finding that the proposed Project improvements would not directly or indirectly affect aircraft operations or passenger demand by 2028. Therefore, the potential environmental impacts associated with the proposed Project were adequately analyzed in the Draft EIR.

[1] The LAX Landside Access Modernization Program Draft EIR was released in September 2016. As further documented in the response to the commenter's comment LAMP-AL00008-2, since 1996, fluctuations in passenger activity levels have occurred alongside heavy traffic congestion conditions at LAX with some areas of the Central Terminal Area (CTA) operating at LOS F. The LAX Landside Access Modernization Program Draft EIR further documented that over half of the CTA roadways operated at LOS E or F at certain times of the day in 2014 (see Table 4.12.1-7 and discussed on page 4.12-20 of Section 4.12.1 of the LAX Landside Access Modernization Program Draft EIR).
[2] Transportation Research Board of the National Academies, Airport Cooperative Research Program, ACRP Report 98, Understanding Airline and Passenger Choice in Multi-Airport Regions, 2013, p. 33. Available:
http://www.trb.org/Publications/Blurbs/170194.aspx.
[3] Transportation Research Board of the National Academies, Airport Cooperative Research Program, ACRP Report 98, Understanding Airline and Passenger Choice in Multi-Airport Regions, 2013, p. 12. Available:
http://www.trb.org/Publications/Blurbs/170194.aspx.
[4] Transportation Research Board of the National Academies, Airport Cooperative Research Program, ACRP Report 98, Understanding Airline and Passenger Choice in Multi-Airport Regions, 2013, p. 12. Available:
http://www.trb.org/Publications/Blurbs/170194.aspx.
[5] City of Los Angeles, Los Angeles World Airports, Final Environmental Impact Report for the LAX Landside Access Modernization Program, Volume 11, Responses to Comments, Corrections & Additions to the Draft EIR, February 2017, p. 2-82.
[6] Southern California Association of Governments, Connect SoCal: The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments, Aviation and Airport Ground Access Technical Report, adopted September 3, 2020, pp. 24-25. Available: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_aviation-and-airport-ground-access.pdf?1606001540.

ATMP-AL010-47

Comment: F. The DEIR Lacks Evidence for Its Claims that the Airport Without the Project Could Accommodate the Same Operations/Year as With the Project in 2028, 2033 and 2045.

In addition to misleading the public and decisionmakers that the Project would not affect aircraft operations because the Project would only result in a delay savings of roughly 1 minute in 2028, LAWA also assumes that the level of aircraft operations in 2028, and 2033 and 2045 would be the same with or without the Project. The DEIR lacks substantial evidence for this assumption. Furthermore, the DEIR states that the hypothetical "Without Project" scenario was created for the "informational" purpose of showing that operations under the "With Project" scenario would be the same as "Without Project" in 2028, and therefore that the Project essentially has no operational impacts. Yet, this hypothetical "Without Project" scenario contains serious flaws, for the reasons explained below. Thus, rather than having "informational" value, this scenario misleads the public about the Project's actual impacts.

Response: The Draft EIR's aircraft operations forecast is accurate and based on substantial evidence. As discussed in Response to Comment ATMP-AL010-33, the technical analyses documented in Appendix B.2 of the Draft EIR estimated annualized average all-weather delays under the proposed Project scenario would be 1.3 minutes lower than under the No Project scenario (see Tables 3-2 and 3-3 and Exhibit 3-2 in Appendix B.2 of the Draft EIR). It also clearly documented how these differences in average delay results would not result in increased activity levels at LAX, as further documented in Responses to Comments ATMP-AL010-205 through ATMP-AL010-207.

The number of aircraft operations were forecasted based upon a regression analysis consistent with industry forecasting standards (see Section 3 of Appendix B.1 of the Draft EIR). As stated in Section 3.4 of Appendix B.1, the number of operations was first forecasted "independently from any existing or future constraints (e.g., operational or regulatory constraints) at LAX." A constrained demand scenario was then developed to reflect limitations of the airfield system at LAX on the number of forecasted operations (see Section 4 of Appendix B.1 of the Draft EIR). Flight schedules were subsequently prepared, based on the results of the constrained demand scenario, and simulated using an FAA approved airfield simulation model, as documented in Section 3 of Appendix B.2 of the Draft EIR. As discussed in Section 4.3 of Appendix B.1 of the Draft EIR, the flight schedules were successfully gated under both the proposed Project and No Project conditions. Flight schedules were also successfully simulated using the FAA approved, industry standard, airspace simulation model (SIMMOD) as documented in Section 3 of Appendix B.2 of the Draft EIR. Therefore, the proposed Project would not directly or indirectly affect the number of operations that are forecasted and that can be accommodated at LAX in 2028. The delay savings cited by the commenter are the results of the airspace simulation modeling efforts documented in Section 3.6 of Appendix B.2 of the Draft EIR. All these analyses, therefore, constitute substantial evidence, consistent with the State CEQA Guidelines' definitions (see Section 15384 of the State CEQA Guidelines). Accordingly, LAWA's aviation experts have documented facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts in Appendix B of the Draft EIR.

The commenter is correct that the LAX Airfield and Terminal Modernization Project forecasts assumes that the number of aircraft operations in 2028 and 2033 would be the same with or without the proposed Project. This assumption is supported by substantial evidence, as documented in Section 4.3 of Appendix B.1 of the Draft EIR, and as further discussed throughout LAWA's responses to commenter, the 2028 and 2033 flight schedules were successfully gated under both the No Project and proposed Project scenarios. Regarding aircraft operations in 2045, however, the Draft EIR did not analyze or make any findings associated with the ability of LAX to accommodate projected demand in 2045. Please see Topical Response TR-ATMP-G-3 regarding the bases for why 2028 is the appropriate horizon year for evaluating the impacts of the LAX Airfield and Terminal Modernization Project.

The commenter is incorrect that the Without Project scenario is "hypothetical." As further discussed in the Response to Comment ATMP-AL010-54 and Topical Response TR-ATMP-G-2, the West Remote Gates and the Midfield Satellite Concourse (MSC) South gates were appropriately included as part of the Without Project scenario. Accordingly,

the Without Project scenario analyzed in the Draft EIR was correctly identified and did not reflect hypothetical conditions.

For the reasons explained above, the Draft EIR's comparison of 2028 With Project to 2028 Without Project is not misleading. The Draft EIR is clear that comparisons made between 2028 With Project and 2028 Without Project are provided "for informational purposes only" and explains that, with the limited exceptions discussed in Chapter 4 of the Draft EIR, "the significance of the proposed Project impacts is not based on this comparison." Such discussions are always preceded by comparisons between 2028 With Project and the appropriate CEQA baseline and the applicable threshold of significance. The public and decision-makers are provided the necessary and appropriate information regarding Project impacts, as required by CEQA.

ATMP-AL010-48

Comment: 1. The DEIR Assumes Without Evidence that LAX Could Accommodate 853,000 Annual Operations in 2045 Without the Project.

LAWA assumes that even if the Project were not built, due to the many other capital improvements that will be up and running, the airport could accommodate 853,000 annual aircraft operations by 2045. DEIR, Appendix B.1, Table 4-1 at p. 4-11. Yet the only evidence LAWA provides for this claim is the statement that "[s]everal terminal facilities at LAX have been in the process of being modernized to ensure the ability of aging terminal facilities and passenger processors to accommodate demand for air travel, [including] Midfield Satellite Concourse, Terminals 2 and 3 Modernization Project, and LAX Terminal 1.5 Project. Therefore, existing and planned terminal facilities would provide adequate processing facilities for all existing and planned passenger gates in FY 2028 and FY 2033." Id. at p. 4-6.[32]

[32] El Segundo's November 24, 2020 PRA request asked for "all documents supporting the statement that existing facilities could accommodate 127.9 MAP, including, but not limited, to evidence for the statement on p. 4-6 of Appendix B.1 to the DEIR that 'existing and planned terminal facilities would provide adequate processing facilities for all existing and planned passenger gates in FY 2028 and FY 2033.'" LAWA's response to this request—which, curiously, LAWA also provided in response to the PRA request described in footnote 17, supra—does not substantiate the quoted statements from the DEIR. LAWA therefore lacks substantial evidence for this claim, in violation of CEQA.

Response: Contrary to the commenter's assertion, the Draft EIR did not analyze what level of aircraft operations LAX could accommodate in 2045. This number of aircraft operations was estimated in conjunction with the aviation demand forecast presented in Appendix B.1 of the Draft EIR, which includes a projected annual growth rate extrapolated out to 2045, while taking into account the limitations of the LAX airfield in accommodating such projected growth in future aircraft operations (i.e., the constrained demand scenario documented in Section 4.5 of Appendix B.1 of the Draft EIR. Please see Response to Comment ATMP-AL010-47 for further discussion regarding the forecast assumptions

documented in Appendix B.1). That projection of annual aircraft operations out to 2045, along with the associated number of passengers, provides a basis for long-term regional planning, such as used in the Southern California Association of Governments' Regional Transportation Plan/Sustainable Communities Strategies, it is not suitable or appropriate to apply to a specific project that will be operational much sooner than that, as in the case of the proposed LAX Airfield and Terminal Modernization Project that will be operational in 2028. An analysis of whether LAX, overall, could accommodate 853,000 annual aircraft operations was not, and need not be, completed as part of the Draft EIR analysis. In short, the technical analyses documented in Appendix B.2 of the Draft EIR considered 2028 as the buildout year of the proposed Project (as stated in Section 1.5 of the Draft EIR) and, therefore, did not make any findings associated with the ability of LAX to accommodate the forecasted number of aircraft operations in 2045. In fact, the quotation from the Draft EIR included in the comment regarding existing and planned terminal facilities is expressly limited to existing and planned passenger gates "in FY 2028 and FY 2033." Please see Topical Response TR-ATMP-G-3 regarding the bases for why 2028 is the appropriate horizon year for evaluating the impacts of the LAX Airfield and Terminal Modernization Project.

In Footnote 32, the commenter discusses a California Public Records Act (CPRA) request they submitted to LAWA requesting documents supporting the ability of LAX to accommodate 127.9 million annual passengers (MAP). As documented in Table 4-1 of Appendix B.1 of the Draft EIR, 127.9 MAP is the result of the constrained demand scenario forecast for 2045. The commenter states that the information provided by LAWA in responses to their CPRA request did not provide evidence that LAX could accommodate 127.9 MAP. As discussed above, the Draft EIR analyses did not study or make any findings regarding the ability of LAX to accommodate demand in 2045, nor was it required for the purposes of CEQA documentation. Please refer to Topical Response TR-ATMP-G-3 regarding the selection of the horizon year for impact analyses for the LAX Airfield and Terminal Modernization Project Draft EIR.

ATMP-AL010-49

Comment: As an initial matter, there appears to be a calculation error in the DEIR's claim that the airport could accommodate all forecasted constrained demand in 2045 without the Project. Appendix B.1, Table 4-1 states that at 853,000 operations in 2024, LAX would be processing 127.9 MAP. However, the Kanafani Report finds that the assumptions used to convert forecasted operations to MAP (percent of operations that are scheduled passenger service (90%), average load factor (90%), and average seats for departure (190)), when applied correctly, result in a conversion from 853,000 operations/year to 131 MAP, more than 3 MAP higher than the level the DEIR claims is the maximum passenger traffic the airport could accommodate without the Project in 2045. Kanafani Report at p. 2. The Kanafani Report further notes that the use of two different average seats for departure assumptions for the constrained scenario (190) versus the unconstrained scenario (204) is unjustified; if the constrained scenario reflects airlines' response to increase delays by increasing seating densities and load factors, then the average seats per departure should be higher under constrained conditions. The Kanafani Report concludes that "this casts doubt about the validity of the forecast

numbers and requires correction, and a clarification of the assumptions used about the relation between flight operations and passenger traffic forecasts." Id.

Response: This comment refers to and provides excerpts from the Kanafani Report. Please see Response to Comment ATMP-AL010-203 (which provided responses to all items asserted by the commenter). Accordingly, contrary to the commenter's assertion, no calculation error was made in Appendix B of the Draft EIR and, therefore, the forecast numbers documented in Appendix B.1 are valid.

ATMP-AL010-50

Comment: Furthermore, it is not enough for LAWA to assert that "existing and planned terminal facilities would provide adequate processing facilities" in 2028 and 2033 in order to avoid analyzing any of the Project's operational impacts. LAWA would also have to show that existing and planned terminal and airfield facilities would provide adequate infrastructure for all forecasted passenger levels and aircraft operations after 2033, including in 2045; for the reasons already explained above, LAWA cannot do so. Moreover, LAWA's statement that MSC and the Terminals 1.5, 2 and 3 modernizations would enable LAX to accommodate planned passenger gates/fleet mixes by 2028 and 2033 without the Project is an admission that these projects do expand LAX's operational capacity, despite LAWA's denials in the associated CEQA documents.

Response: The commenter refers to the discussion included in Section 4.3 of Appendix B.1 of the Draft EIR related to the ability of existing and planned terminal facilities to provide adequate processing facilities for existing and planned passenger gates in 2028 and 2033. The commenter asserts that the Draft EIR should have analyzed the ability of the terminal processing facilities to accommodate demand through 2045. Please refer to Topical Response TR-ATMP-G-3 regarding the bases for why 2028 is the appropriate horizon year for evaluating the impacts of the LAX Airfield and Terminal Modernization Project.

Contrary to the commenter's allegation, the Draft EIR did not assert that improvements associated with the Midfield Satellite Concourse and Terminals 1.5, 2 and 3 would "enable" LAX to accommodate demand in 2028 and 2033 without the proposed LAX Airfield and Terminal Modernization Project. Section 4.3 of Appendix B.1 of the Draft EIR states: "Several terminal facilities at LAX have been in the process of being modernized to ensure the ability of aging terminal facilities and passenger processors to accommodate demand for air travel." Demand of air travel was forecasted and represented in Design Day Flight Schedules (DDFS) as documented in Appendices B.1 and B.2, respectively. These DDFSs represent aircraft and passenger demand which was developed independently from any existing or future limitations (e.g., physical, operational, or potential regulatory limitations), as documented in Section 1 of Appendix B.1 of the Draft EIR. Therefore, the demand for aircraft and passenger activity is projected to be realized, with or without the proposed Project improvements, or other terminal improvements currently underway. As further explained in Response to Comment ATMP-AL010-44 above, the projects identified by the commenter and discussed above, individually or together, will not affect the capacity of the airfield

system component, which has been documented to be the constraining component in the LAX Airfield and Terminal Modernization Project Draft EIR.

ATMP-AL010-51

Comment: Although LAWA claims that both SCAG and FAA data independently verify LAWA's aviation forecast, including LAWA's assertion that the existing facilities in 2045 (without the Project) could accommodate 127.9 MAP, this is false. SCAG's current RTP/SCS states that its 2045 passenger forecasts by airport were "provided by SCAG region airports" (i.e., LAX and other airports), not independently developed. See 2020-45 SCAG RTP/SCS Aviation and Airport Ground Access Technical Report, Table 12 at p. 33;[33] id. at p. 32 (stating the "regional aviation forecast involved . . . airport-level numbers based on capacity constraints and analyses provided by the airports, which were then totaled up to a regional level."). LAWA thus cannot rely on SCAG's RTP/SCS as independent verification of LAWA's aviation forecast.

[33] Available at https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_aviation-and-airport-ground-access.pdf?1606001540; last accessed Feb. 9, 2020.

Response: Contrary to the commenter's assertion, LAWA did not rely on SCAG's RTP/SCS "as independent verification of LAWA's aviation forecast." Several sections in the Draft EIR discuss the SCAG forecasts, as follows:

- The second paragraph in Section 1.1.3 of the Draft EIR states: "These improvements would help LAX to prepare early for the continued aviation growth that is projected by LAWA, the Southern California Association of Governments (SCAG), and the Federal Aviation Administration (FAA) to occur at LAX over the next several decades."
- Section 2.3.1.2.1 of the Draft EIR discusses the SCAG regional aviation activity forecast and clearly states that SCAG reached out to each airport in the region, including LAX, to incorporate individual airport forecasts in their Regional Transportation Plan's forecasts. As documented in Table 2-1 in Section 2.3.1.2.1 of the Draft EIR, SCAG subsequently allocated 127 million annual passengers (MAP) to LAX in horizon year 2045.
- Section 2.3.1.2.2 further documents the fact that both forecasts (SCAG's and the LAX Airfield and Terminal Modernization Project's forecasts) are "essentially the same". Footnote 11 in Section 2.3.1.2.2 correctly states that these forecasts are therefore "consistent" with each other.

Thus, the Draft EIR clearly documented the fact that the SCAG's forecasts were based on data provided to SCAG by LAWA.

Further, the Draft EIR did not suggest that "the existing facilities in 2045 (without the Project) could accommodate 127.9 MAP" as the commenter asserts. The Draft EIR analyses were based on the activity forecasts documented in Appendix B.1 of the Draft EIR, which provided forecasts of annual passengers and operations at LAX through 2045.

The commenter correctly cites the results of the constrained demand scenario documented in Section 4 of Appendix B.1 of the Draft EIR, which estimated that passenger demand at LAX could reach 127.9 MAP (see Table 4-1 in Appendix B.1). However, the Draft EIR did not analyze aircraft or passenger activity beyond 2028 (the buildout year of the Airfield and Terminal Modernization Project improvements). Therefore, the Draft EIR did not analyze or conclude that the existing facilities in 2045 (without the Project) could accommodate 127.9 MAP. Please refer to Topical Response TR-ATMP-G-3 regarding the selection of the horizon year for impact analyses for the LAX Airfield and Terminal Modernization Project Draft EIR.

ATMP-AL010-52

Comment: It also bears noting that, the last time LAWA relied on a long-range passenger forecast in an environmental document—in the 2016 LAMP EIR—LAWA claimed that the effective passenger capacity of LAX was 96.6 MAP, based on the purported "airfield constraint" at the time. Exhibit 12, 2016-2040 RTP/SCS Aviation & Airport Ground Access Appendix at p. 20. LAWA and SCAG asserted that this represented the effective maximum capacity of LAX "limited by the [four-runway] airfield." Id. However, "[a]lternative runway configurations, (e.g., Alternative A or B in the LAX Master Plan) proposed an additional fifth runway at LAX. Even though neither the LAX airfield, nor the airport's operating procedures, has materially changed since 2016, the DEIR claims that the airport could accommodate nearly 111 MAP in 2028 under without-Project conditions. The fact that LAWA's own passenger forecast jumped by nearly 15 MAP in just a few years, based on identical facilities, casts serious doubt on LAWA's assertions regarding the airport's capacity with or without the Project. The DEIR must explain this significant discrepancy, which, on its face, appears to confirm LAWA's pattern and practice of claiming projects will not affect existing capacity at the time they are proposed, yet revealing after they are approved that capacity nonetheless increased.

Response: The commenter asserts that the LAX Landside Access Modernization Program EIR (2016) stated that the effective passenger capacity of LAX was 96.6 million Annual Passengers (MAP). The commenter does not cite a passage in the LAX Landside Access Modernization Program EIR to support this assertion. Instead, the commenter cites the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The RTP/SCS is a planning document prepared by the Southern California Association of Governments (SCAG). The RTP/SCS is not prepared by LAWA. Therefore, the commenter incorrectly attributes statements or analyses prepared by SCAG to LAWA.

The commenter further incorrectly states that LAWA "asserted that this represented the effective maximum capacity of LAX." The commenter did not provide a specific citation to support their statement, nor did LAWA make a finding that 96.6 MAP was the "effective maximum capacity of LAX."

The commenter further discusses alternatives considered in the LAX Master Plan (Alternatives A and B) and asserts that these alternatives could yield higher airfield capacities, as they included a fifth parallel runway. By contrast, the airfield improvements proposed under the LAX Airfield and Terminal Modernization Project do

not include constructing an additional runway. The potential impacts of the proposed Project improvements on airfield operations are documented in Section 3 of Appendix B.2 of the Draft EIR and supported by substantial evidence in the record. As concluded, the forecasted aircraft operations and passenger demand (and airline scheduling practices to meet such demand) would not change as a result of the With Project improvements.

As discussed above, LAWA did not establish the 96.6 MAP as any type of threshold or metric associated with LAX's capacity. As further documented above, the activity level of 96.6 MAP was identified by SCAG based on assumptions documented in SCAG's 2016-2040 RTP/SCS.[1]

[1] Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, Aviation & Airport Ground Access Appendix, p. 20, April 2016. Available: https://scag.ca.gov/sites/main/files/file-attachments/f2016rtpscs_aviation.pdf?1606073518.

ATMP-AL010-53

Comment: Similarly, although FAA determined that LAWA's aviation forecast through 2028 (10 years from the baseline year) is consistent with FAA's Terminal Area Forecast ("TAF"), FAA made no consistency determination regarding LAWA's 2045 aviation forecast, which looks more than twice as far into the future. See DEIR, Appendix B.1 at p.3-2, fn. 9 (ATMP forecast is "considered consistent with the TAF if the results differ by less than 10 percent in the 5-year forecast period, and 15 percent in the 10-year forecast period."). Thus, the DEIR's claims that FAA has "acknowledged" that deviations between actual future activity levels and LAWA's "long-term forecast period through 2045" are "expected" (id. at 3-2), and that FAA deemed LAWA's long-term forecast "consistent" with the TAF for the purposes of the Project (DEIR, Appendix B.1, Attachment A at p. A-1), are inaccurate. FAA's consistency determination is not substantial evidence of the accuracy of LAWA's aviation forecast though 2045.

Response: The commenter correctly states the fact that the aviation activity forecast approval issued by the Federal Aviation Administration (FAA) in September 2020 (see FAA correspondence in Appendix B.1 of the Draft EIR) only pertained to activity levels through 2028 (within 10 years of a forecast's baseline year of 2018).

As documented in Section 3.2.1 of Appendix B.1, per FAA guidance, the FAA's review of forecasts for consistency with their Terminal Area Forecast (TAF) is limited to a period of 10 years beyond the baseline year of the project. In the case of the LAX Airfield and Terminal Modernization Project, the FAA's approval covers the period of 2018 (baseline year) through 2028 (future year). As subject matter experts in aviation, the FAA reviewed Appendix B.1 and issued an approval pertaining to the forecasted activity levels through 2028, which is the year of completion of the proposed Project improvements analyzed in the Draft EIR. This approval, in association with Appendix B.1 of the Draft EIR, which the FAA relied upon to issue their approval, constitutes substantial evidence of the

validity of forecasted activity levels through 2028. Please also see Topical Response TR-ATMP-G-1 for additional information related to the FAA's review of forecasts.

ATMP-AL010-54

Comment: 2. The DEIR Improperly Assumes the Simultaneous Operation of the 23-Gate MSC and Existing 18 West Remote Gates for Purposes of the "No Project" Aviation Forecast.

LAWA also claims that existing/planned facilities' alleged ability to accommodate growth is "evidenced by the fact that flight schedules developed to support airfield simulation efforts for FY 2028 and FY 2033 were successfully gated, and that existing and planned passenger gates at LAX can accommodate the FY 2028 and FY 2033 projected aircraft fleet mixes." DEIR, Appendix B.1 at p. 4-6. This "gating analysis" contains substantial flaws with regard to its conclusion about the ability to accommodate growth in 2028 and 2033, as well as in 2045.

First, the "gating analysis" assumes the construction of 8 gates at MSC South, despite the fact that the MSC South Project has not been approved yet, and in fact is the subject of a detailed CEQA comment letter submitted by El Segundo and never addressed by LAWA. LAWA's "gating analysis" further errs by assuming that the current 18 West Remote Gates ("WRG") will still be operating as a bus gate facility in 2028 and 2033. DEIR, Appendix B.2 at p. 2-2. As explained earlier, LAWA has repeatedly committed to decommissioning all of the WRGs once the MSC is built. Thus the gating analysis cannot assume the simultaneous operation of both the 23-gate MSC and the 18 WRGs, to make it look as though the airport without the Project could accommodate the same level of growth as if the Project were approved. See DEIR, Appendix B.2, Exhibit 2-2 (showing 23 MSC gates, and all 18 current WRGs, in operation under the hypothetical "No Project" Scenario in 2028).[34]

By padding this hypothetical "No Project" scenario with at least 18 additional gates that would not actually exist in 2028 or after, LAWA fails to carry its burden to show that the Project would not alleviate existing constraints on capacity. LAWA must therefore analyze and disclose the environmental impacts from the Project's effect on accommodating growth.

[34] In response to El Segundo's November 24, 2020 PRA request, LAWA provided what appear to be portions of its "gating analysis," including several simulation ("SIMU14") files which we are unable to access. However, the portions of this disclosure which we are able to open indicate that LAWA has only conducted this "gating analysis" through 2033. Thus, based on the limited data LAWA has provided in the DEIR and in response to El Segundo's PRA request, there appears to be no evidence for the DEIR's assumption that the airport without the Project could accommodate the constrained demand forecast in 2045. See Kanafani Report at p. 4 ("Summary and Recommendation"). Without such evidence, LAWA cannot claim that the Project will not alter the constrained forecast by delaying the slowdown in growth. Furthermore, it is unclear whether the gating analysis takes into account the fact that passenger gates at LAX are

not fungible, and thus any capacity remaining at some gates cannot necessarily absorb overcapacity at other gates. Unless the gating analysis reflects this reality it is not evidence of LAX's ability to accommodate growth without the Project.

Response: Please see Topical Response TR-ATMP-G-2 regarding the Draft EIR's assumptions regarding the Midfield Satellite Concourse (MSC) and the West Remote Gates in the "No Project" aviation forecast. As demonstrated in the topical response, the Draft EIR assumptions are reasonable and based on substantial evidence, and there are no flaws in the gating analysis prepared for the Draft EIR with regard to accommodating growth in 2028 and beyond. As described in the topical response, the Board of Airport Commissioners (BOAC) approved Phase 2 of the MSC Program on August 1, 2019, and the assumption that there will be up to 23 gates for the MSC (Phase 1 and Phase 2) and 18 West Remote Gates under the No Project scenario in 2028, is correct.

Regarding the letter submitted by the City of El Segundo on the MSC South project, as explained above in Response to Comment ATMP-AL010-20, LAWA has determined that, although it was not separately required by CEQA to respond to the letter on MSC Phase 2, it is appropriate to respond to the allegations in that letter in the context of this Final EIR. The comments have been assigned numbers ATMP-AL010-310 through ATMP-AL010-318. Responses to these comments are provided in Topical Response TR-ATMP-G-2 and/or in the individual responses to comments.

In Footnote 34 to the comment letter, the commenter discusses files provided by LAWA to respond to the commenter's California Public Records Act (CPRA) request. The commenter notes that gating analyses were conducted for 2033, which is correct, as stated in Section 4.3 of Appendix B.1 of the Draft EIR. However, as discussed above, the Draft EIR did not document any findings or provide conclusions related to the ability of LAX to accommodate projected growth in 2045. The Draft EIR analyses were conducted to analyze expected conditions in 2028, the full buildout year of the proposed Project, as documented in Section 1.5 of the Draft EIR. Therefore, contrary to the commenter's assertion, evidence that LAX can accommodate activity levels projected in 2045 is not required. Please see Topical Response TR-ATMP-G-3 regarding the assessment of future environmental effects associated with the LAX Airfield and Terminal Modernization Project beyond the buildout year of 2028.

The commenter also noted in Footnote 34 of the comment that it was unclear "whether the gating analysis took into account the fact that passenger gates at LAX are not fungible and, thus, any capacity remaining at some gates cannot necessarily absorb overcapacity at other gates." Table 2-2 of Appendix B.2 of the Draft EIR documents airline assignments assumed in the gating analyses. Contrary to the commenter's assertion, gates can be fungible in the context of common use operations at LAX. For instance, common use operations are in place at the Tom Bradley International Terminal and at the West Remote Gates, and will be at the new West Gates at Tom Bradley International Terminal (formerly referred to as the MSC North Project). Such conditions were reflected in the Draft EIR gating analyses, as appropriate, based on the assignments listed in Table 2-2 of Appendix B.2 of the Draft EIR. As a result, the 2028 flight schedule was able to be gated

under both scenarios (No Project and proposed Project), as documented in Section 2 of Appendix B.2 of the Draft EIR.

ATMP-AL010-55

Comment: 3. The DEIR's "Without Project" Scenario Suffers from the Same Flaws as the "No Project" Scenario and Thus Has No "Informational" Value.

The DEIR's "Without Project" scenario, supposedly provided for the purely "informational" purpose of claiming that environmental impacts would be the same with or without the Project, is misleading for the same reasons as discussed in Part II.F.2. LAWA must revise the "Without Project" scenario to omit the MSC South Project and the 18 WRGs, and reevaluate whether environmental impacts are actually different under each scenario.

Additionally, the DEIR does not define the "Without Project" scenario or describe what future conditions it assumes. LAWA must disclose a complete list of all of the infrastructure improvements it is assuming would exist under the Without Project scenario.

Response: The Without Project scenario includes the same improvements and activity levels as the No Project Alternative, which is described in Section 5.4.2.1 of the Draft EIR. In response, Footnote 38 on page 4.1.1-9 of the Draft EIR has been revised to provide that clarification. Please see Chapter F3, Corrections and Clarifications to the Draft EIR.

Regarding the alleged "flaws" associated with the Without Project scenario, including the assertion that LAWA should exclude the eight gates associated with Phase 2 of the Midfield Satellite Concourse (MSC) Program and the 18 West Remote Gates from the Without Project scenario, please see Topical Response TR-ATMP-G-2. As explained in the topical response, the Draft EIR's assumptions for the Without Project scenario (i.e., the No Project scenario) are reasonable and based on substantial evidence.

ATMP-AL010-56

Comment: III. The DEIR Fails to Justify the Proposed Taxiway C Extension's Connection to the Project, or Disclose Its Impact on Overall Airport Capacity and the Environment.

The Project would include various improvements and modifications to existing taxiways near the proposed Concourse 0 and Terminal 9 to facilitate aircraft access to and from the gates at those facilities. However, the DEIR is severely lacking in its description of these improvements, in particular the proposed extension of Taxiway C from Taxiway C3 to Taxiway B1. Furthermore, although El Segundo in its comments on the NOP stated that the DEIR must include a full description of proposed Taxiway C extension's effect on operational efficiency and the associate impacts, the DEIR fails to do so.

LAWA has proposed the Taxiway C extension previously, including as an alternative to the 2014 Runway 7L/25R RSA and Associated Improvements Project. See LAX Runway 7L/25R RSA Project and Associated Improvements, Initial Study at pp. 13-14, 26.[35] Yet LAWA has never adequately demonstrated the need for, or purpose of the extension or shown that the extension would not impact El Segundo residents. Due to objection by El Segundo, the extension was ultimately deleted from the Revised Draft EIR for the Runway 7L/25R Project. El Segundo believes LAWA lacks justification to include the Taxiway C extension in the ATMP and objects to its inclusion—in part, because it could exacerbate the existing usage imbalance between the north and south runway complexes.

The DEIR's description of the proposed extension is fatally flawed and the document does not analyze how this Project component would impact El Segundo. If LAWA intends to keep the Taxiway C extension, it must first revise the DEIR to include this information and analysis.

[35] Available at https://www.lawa.org/lawa-our-lax/environmental-documents/documents-certified/runway-7l-25r-runway-safety-area-and-associated-improvements; last accessed Feb. 9, 2021.

Response: The Draft EIR appropriately analyzes the effect of the proposed Taxiway C easterly extension. As stated on page 2-27 in Section 2.4.2.2 of the Draft EIR, "Terminal 9 is planned as an international and domestic terminal facility with up to 12 to 18 gates and the capability to support [Airplane Design Group] ADG VI operations." Page 2-28 further describes that the associated airfield improvements would support aircraft movements to and from Terminal 9 through the relocation of Vehicle Service Road C and the easterly extension/relocation of Taxiway C from Taxiway C3 to Taxiway B1 at ADG VI separation. The existing taxiway network adjacent to the proposed Terminal 9, as well as other areas east of the Terminal 9 site, does not meet FAA separation standards for ADG VI, whereas the proposed eastward extension/relocation meets ADG VI separation standards and would facilitate the movement of these aircraft to and from Terminal 9, in addition to other aircraft movements independent of Terminal 9 that are assigned by the FAA to this area of the airfield in order to increase overall aircraft movement efficiencies.

As further described in Section 3 of Appendix B.2, airfield and airspace simulation models were developed to evaluate the effects of the proposed Project on aircraft operational efficiency, including aircraft using the easterly extension of Taxiway C. Operations on the proposed Taxiway C extension were not limited to just Terminal 9 operations; therefore, the effect of the Taxiway C easterly extension was accounted for in the overall assessment of proposed Project airfield movement analysis. Outputs from the airfield and airspace simulation models were considered when analyzing the proposed Project's impacts related to aircraft noise (Section 4.7.1) and air pollutant emissions, including GHG emissions, that would result from aircraft operations (Section 4.1 and Section 4.4, respectively) to communities around the airport including, but not limited to, El Segundo.

ATMP-AL010-57

Comment: A. LAWA Has Long Wanted to Build the Taxiway C Extension.

Once again, LAWA is proposing to extend Taxiway C for reasons that are not disclosed and which have no discernable connection to the larger Project.[36] In 2012, El Segundo commented that the Runway 7L/25R RSA Project EIR failed to adequately explain the linkage between the RSA improvement and this "associated improvement," and that if LAWA had another reason for extending Taxiway C, LAWA must disclose that reason.

LAWA's failure to explain why it needs the Taxiway C extension here suggests that LAWA is trying to surreptitiously slip this long-desired airfield improvement into the ATMP without acknowledging its impacts to operational capacity or land uses to the south of the airport. This perception is underscored by the fact that the DEIR contains no more than the following regarding the proposed Taxiway C extension: "Other related airfield improvements that would support Terminal 9 include the . . . easterly extension of Taxiway C from Taxiway C3 to Taxiway B1 . . . the relocated/extended Taxiway C would be designed at ADG VI separation from Taxiway B." DEIR at p. 2-28. Furthermore, this cursory description of the Taxiway C extension is misleadingly buried in the description of Terminal 9 (section 2.4.2.2), rather than in the separate DEIR section describing, with a 2-page narrative, other "airfield elements" including the Taxiway D extension and the proposed Runway 6L/24R exits (section 2.4.1).

Based on historical documents, El Segundo believes that LAWA wants to finally build the Taxiway C extension to alleviate the longstanding problem of departing aircraft "queuing" on Taxiways C and B such that they interfere with passenger enplanement/deplanement at Terminal 8. Furthermore, since Terminal 9 would be built between Terminal 8 and the east end of Runway 7L/25R, this queueing could interfere with enplanement/deplanement at Terminal 9 as well. Prolonging the time it takes for departing/arriving flights to pull away from/arrive at these passenger terminals could further contribute to airfield delay that LAWA admits would occur without the Project; moreover, the DEIR fails to clearly state that the addition of Terminal 9 and these new aircraft operations would exacerbate the existing queueing problem if the Taxiway C extension were not built. See DEIR at p. 2-28 (vague statement that the proposed Taxiway C extension would "support" operations at Terminal 9). The Taxiway C extension thus would help alleviate delay.

LAWA previously indicated this reason for the Taxiway C extension in a study that El Segundo requested as part of the Runway 7L/25R RSA environmental review process. There, LAWA stated that shifting the runway to the west (as proposed by El Segundo as its preferred alternative to the proposed RSA project), which would obviate the need for the Taxiway C extension, would shift the departure queue on Taxiways B and C to the west and thus "may block gates" at Terminal 8. Exhibit 13, January 29, 2015 Runway Shift Study at slide 8. Queuing on Taxiways B and C is particularly problematic for LAX because "[m]ost aircraft that utilize the South Airfield for departure begin that process on Runway 25R and its connecting taxiways. As such, this portion of runway and its associated taxiways handle a large amount of traffic." 7L/25R RSA Project DEIR at p. 2-11.

Existing condition (from Google Maps, last accessed December 8, 2020):

[See original comment letter for figure.]

Proposed condition (DEIR, Fig. 2-13):

[See original comment letter for figure.]

LAWA diagram with taxiway designations (available at https://www.lawa.org/-/media/lawa-web/group-and--division/files/lawa-airport-operations/airfield/airfieldmap.ashx; last accessed February 22, 2021):

[See original comment letter for figure.]

LAWA further described the design and purpose of the proposed Taxiway C extension in a March 2015 report, yet none of the description from this report is reflected in the DEIR. There, LAWA stated that "[e]xtending Taxiway C . . . may enhance FAA air traffic control's ability to use Runway 25R for departures in lieu of Runway 25L by providing a second access point to the Runway 25R end. The Taxiway C extension would ease air traffic control's ability to transition aircraft from Taxiway A to a departure queue on Taxiway B and Taxiway C." Exhibit 14, March 2015 Runway Shift Study Final Report at p. 6. Furthermore, currently, "[t]he departure queue often extends west beyond Taxiway C6, resulting in congestion and delay for aircraft waiting to taxi to or push back from gates at Terminal 7 and Terminal 8." Id. at p. 60. Air Traffic Control "expressed their support for the Taxiway C extension on numerous occasions noting that it would improve their ability to efficiently manage departures and would ease access to Runway 25R from Taxiway A." Id. at p. 82 (listing "benefits . . . associated with the Taxiway C extension," including "[l]arger queue area to stage for Runway 25R," "reduce[d] aircraft idle time on Taxiway A," and "enhance[d] access to the B1 aircraft parking apron even when aircraft are queued for departure.").

In sum, the DEIR must clearly state the purpose and need for the Taxiway C extension and properly describe it as an "airfield element" of the Project.

[36] Notably, the 2004 LAX Master Plan does not call for the proposed extension of Taxiway C.

Response: Much of the content of this comment is substantively the same as comment ATMP-AL010-56; please refer to Response to Comment ATMP-AL010-56 for an explanation of how the relocation of Vehicle Service Road C and the easterly extension of Taxilane C support the proposed Terminal 9.

The commenter also asserts that the easterly extension of Taxilane C has no discernable connection to the proposed Project because it was considered in some previous planning studies to facilitate queuing for Runway 25R departures and ease congestion in the vicinity of Terminals 7 and 8, but was not considered as part of the 2004 LAX Master Plan. However, the proposed Project differs from the previous studies because they did

not consider a new terminal facility located east of Sepulveda Boulevard that needs taxiway infrastructure to support the safe and efficient movement of aircraft. By contrast, the proposed Taxilane C extension would provide necessary taxiway infrastructure to support the safe and efficient movement of aircraft associated with Terminal 9, as well as other aircraft movements in the general area.

Any changes in aircraft operations that would result from the eastward extension of Taxiway C were captured in outputs from the airfield and airspace simulation modeling. These outputs were considered when analyzing the proposed Project's impacts related to aircraft noise (Section 4.7.1) and air pollutant emissions, including GHG emissions, from aircraft operations (Section 4.1 and Section 4.4, respectively) to communities around the airport including, but not limited to, land uses south of the airport.

ATMP-AL010-58

Comment: B. The DEIR Fails to Adequately Disclose the Gains in Operational Capacity from the Proposed Taxiway C Extension.

The DEIR's mislabeling of the proposed Taxiway C extension as a "terminal element" instead of an "airfield element" is more than a quibble over semantics. Because of LAWA's misidentification, the public and decisionmakers should doubt that the aviation growth analysis properly accounted for the proposed Taxiway C extension in calculating the reduction in operational delay attributable to the Project. DEIR, Appendix B.2, Exhibit 3-2. That analysis, in discussing how the Project's reducing effect on airfield delay was calculated, states only that the proposed "airfield modifications and improvements," specifically, the Taxiway D extension and the proposed additional Runway 6L exit taxiways, were used to calculated the reduction in delay. DEIR, Appendix B.2 at p. 3-7. Because the DEIR does not classify the Taxiway C extension as an "airfield element," LAWA appears to have omitted it from the delay reduction analysis.

As LAWA has previously acknowledged, runway or taxiway upgrades, or changes to arrival/departure procedures, "could, in some circumstances, entail changes in the number of operations that LAX can accommodate." Terminals 2 and 3 Modernization Project FEIR at p. 2-31; see also *Barnes v. U.S. Department of Transportation*, 655 F.3d at 1138-39.[37] There is thus no excuse for not specifically showing the effect that each of the Project's proposed airfield elements, including the Taxiway C extension, individually would have on operational capacity as a factor of airfield delay reduction.

Furthermore, the aforementioned 2015 study and other documents provide evidence (cited above) that the Taxiway C extension would increase operational efficiency, and thus capacity, on the south airfield. For example, currently, the south airfield has to partially shut down (i.e., hold aircraft ground operations) when very large aircraft such as the Airbus A380 come through. Exhibit 15, June 14, 2018 NASIP Update at pp. 20-22 (stating that "A380 movements [are] restricted in south airfield" but that the proposed Taxiway C extension would "[a]llow[] for A380 movements at [Terminal 9]."); see also LAWA ADG VI Operational Plan, dated April 20, 2020, at p. 12.[38] Making the proposed changes to Taxiway C would appear to reduce this problem by reducing the area where A380s cause conflicts with aircraft on nearby taxiways/runways. Exhibit 8, August 29,

2018 NASIP Briefing at p. 9 (stating that the Taxiway C extension would "[e]nlarge[] area where ADG VI operations do not impact operations on taxiways or runways.").

LAWA has failed to do the work in this DEIR to show that the taxiway upgrades and associated changes to arrival/departure procedures proposed as part of the Project would not influence the number of operations that LAX can accommodate. See Kanafani Report at p. 3, fn. 1 (DEIR must clarify whether Taxiway C is "identified explicitly as an input into the simulation modeling" depicted in Appendix B.2, Exhibit 3-2.). Furthermore, as explained in Part II, the modeling of delay savings attributable to the Taxiway C extension must be carried out to 2045, the same as the modeling and analysis of the Project's overall impacts. In sum, despite El Segundo's comments on the NOP, the DEIR remains severely lacking in its description of the proposed extension of Taxiway C. The DEIR must include a full description of the proposed improvement and analyze its effect on operational efficiency and the associated impacts of increased operations.

[37] California courts treat federal case law interpreting the National Environmental Policy Act ("NEPA") as "persuasive authority when interpreting CEQA." *W. Placer Citizens for an Agric. & Rural Env't v. Cty. of Placer* (2006) 144 Cal.App.4th 890, 903, as modified on denial of reh'g (Dec. 11, 2006).
[38] Available at https://www.lawa.org/-/media/lawa-web/group-and--division/files/lawa-airport-operations/lax-adg-vi-icao-code-f-operational-plan-final.ashx; last accessed Feb. 9, 2021.

Response: The commenter is incorrect that the proposed Taxiway C extension was not included in the operational delay analysis because it was listed as a "terminal element" and not an "airfield element."

As stated on page 3-4 at the beginning of Section 3.4 of Appendix B.2 of the Draft EIR, the operational analysis (i.e., airfield modeling, which included assessing airfield delay) for the proposed Project included "Terminal 9, and associated taxiway/taxilane improvements." As further documented on page 2-28 in Section 2.4.2.2 of the Draft EIR: "Other related airfield improvements … include the relocation of Vehicle Service Road C and the relocation and easterly extension of Taxiway C from Taxiway C3 to Taxiway B1." The airfield simulations documented in Appendix B.2 account for the extension of Taxiway C, and associated operational benefits. Therefore, contrary to the commenter's statement, the proposed Taxiway C extension was included in the Draft EIR's operational delay analysis. Notwithstanding, Section 3.4 of Appendix B.2 of the Draft EIR has been revised to clarify that "Terminal 9, and associated taxiway/taxilane improvements" includes the easterly extension of Taxiway C. Please see Chapter F3, Corrections and Clarifications to the Draft EIR.

As further described in Section 3 of Appendix B.2, airfield and airspace simulation models were developed to evaluate the effects of the proposed Project on aircraft operational efficiency. The two scenarios modeled were:

- No Project – future-year conditions without the proposed Project
- With Project – future-year conditions with the proposed Project

The With Project scenario model included the airfield elements of the proposed Project improvements and, therefore, captured operational changes associated with the easterly extension of Taxiway C in aggregate with the rest of the proposed Project improvements. Outputs from the airfield and airspace simulation models were considered when the proposed Project's impacts were analyzed related to aircraft noise (Section 4.7.1 of the Draft EIR) and air pollutant emissions that would result from aircraft operations (Section 4.1 of the Draft EIR).

The commenter suggests that the statements made on page 3-7 in Appendix B.2 serve as evidence that the Taxiway C extension was not included due to its omission. The bullet sentences at the end of page 3-7 in Appendix B.2 were intended to summarize the airfield changes that contributed most to the reduction in delay for the With Project scenario compared to the No Project scenario. As discussed above, the extension of Taxiway C was analyzed in the Draft EIR's operational delay analysis. The absence of a statement regarding the extension of Taxiway C in Section 3.6 of Appendix B.2 does not mean it was not included in the airfield model.

The commenter also cites a statement from the Final EIR prepared for the Terminals 2 and 3 Modernization Project, a separate previously-approved project, which notes that changes in runways, taxiways, or aircraft arrival and departure procedures could, in some circumstances, entail changes in the number of operations that LAX can accommodate. The commenter is apparently suggesting that the statement can be interpreted as meaning the Taxiway C extension would somehow lead to additional operations at LAX. That is not accurate for the proposed Project. The number of future-year (2028) operations at LAX would be the same for both the With Project and No Project scenarios, as evidenced in the airfield simulation modeling completed for the Project. Additionally, any changes in operations associated with the proposed Taxiway C extension were analyzed and documented in Appendix B of the Draft EIR. Also see Responses to Comments ATMP-AL010-205 through ATMP-AL010-207 for additional explanation of why the proposed Project would not result in increased activity levels at LAX. The commenter also cites *Barnes v. U.S. Department of Transportation* (2011) 655 F.3d 1124. As explained in Response to Comment ATMP-AL010-39, that decision is not applicable to the facts here.

The commenter further asserts that the Draft EIR should have assessed the effect that each of the proposed Project's airfield improvements, including the extension of Taxiway C, individually would have an effect on operational capacity. This is inconsistent with CEQA. CEQA does not require or encourage separate analysis of each individual component of a proposed project. In fact, doing so would be contrary to CEQA's requirement that the EIR look at the whole of an action. (See State CEQA Guidelines Section 15378(a).) Therefore, the potential impacts associated with the proposed Project improvements (including the airfield improvements) as a whole were properly and adequately documented in Appendix B of the Draft EIR. The operational impacts of all facilities included as part of the proposed Project (including the Taxiway C extension) were properly accounted for in the simulation modeling analysis and, therefore, any impacts on aircraft delays and operational efficiency were also accurately measured. The simulated aircraft movements were also applied as primary source data to assess

emissions and aircraft noise; therefore, effects of all proposed Project improvements are captured in the environmental analysis.

The commenter also asserts that the Taxiway C extension would increase operational efficiency, and thus capacity, on the south airfield and cites the restrictions put in place on the south airfield (Runways 7L-24R and 7R-25L and associated taxiways) to accommodate an Airplane Design Group (ADG) VI aircraft such as the Airbus 380. The commenter is correct in stating that there are restrictions in place when an ADG VI aircraft is operating on the south airfield and that an ADG VI aircraft could be accommodated on the proposed Taxiway C extension. However, the extension alone does not relieve the restrictions for the rest of the south airfield, including when an ADG VI aircraft uses either runway for takeoff or landing. These restrictions and operational procedures were accounted for in the airfield simulations. Associated results of the annual average delay per operation were provided on Exhibit 3-2 in Appendix B.2 of the Draft EIR. As shown there, the Taxiway C extension would not increase operational capacity at LAX.

The commenter asserts that LAWA did not analyze the taxiway improvements and associated changes in arrival and departure procedures. As documented above, the extension of Taxiway C was included in the airfield simulation analyses and therefore analyzed. Further, contrary to the commenter's assertion, the proposed Project improvements do not include any changes in arrival and departure procedures at LAX. The commenter further cites a particular statement in the Kanafani Report, which accompanies the comment letter. Please see Response to Comment ATMP-AL010-205 for the response to the cited comment. Also see Response to Comment ATMP-AL010-39.

Finally, the comment provides a summary statement of comments and assertions discussed in detail above. Contrary to the commenter's assertion, the extension of Taxiway C was properly documented and analyzed in the Draft EIR analyses.

ATMP-AL010-59

Comment: IV. The DEIR's Analysis of Project Alternatives Is Riddled with Errors.

As explained earlier, the DEIR is fundamentally flawed due to its unsupported conclusion that Project impacts would be the same with or without the Project. This flaw is based in part on the failure to analyze Project impacts beyond 2028. If LAWA had done a proper impacts analysis, and disclosed the significant impacts associated with the increase in operational capacity made possible by the Project through 2045, this would show that substantially greater impacts would occur with the Project than without the Project. See Part II; see generally the Kanafani Report. The DEIR's failure to acknowledge the Project's significant impacts through 2045 renders the alternatives analysis meaningless.

Not only does LAWA's "gaming" of CEQA give the false appearance that this enormous expansion—comprising two new terminals, 29 new passenger gates, airfield efficiency improvements and roadway improvements—would effectively have no operational

impacts compared to without the Project, but it also undermines the entire alternatives analysis. The core of an EIR is the mitigation and alternatives sections. *Preservation Action Council v. City of San Jose* (2006) 141 Cal.App.4th 1336, 1350. Yet because of LAWA's refusal to acknowledge the Project's real impacts, the DEIR flips the alternatives analysis on its head, with the result that alternatives that are clearly environmentally superior to the proposed Project appear to be environmentally inferior.

Response: The Draft EIR's analysis of alternatives is appropriate and complies with CEQA. As explained in detail in Topical Response TR-ATMP-G-3, it was reasonable and appropriate for the Draft EIR to use the buildout year of 2028 as the horizon year for environmental analysis. Attempting to predict impacts that could occur in 2045, 25 years after publication of the Draft EIR and 17 years after completion of the Project, would be speculative, particularly in light of the numerous uncertainties inherent in aviation forecasting, and is not required by CEQA. Further, as explained in Section 2.3.1.2.2 of the Draft EIR, the annual activity forecast and regression analysis prepared by LAWA's aviation experts determined that aircraft operations would be the same in 2028 and 2033 with or without the proposed Project, and that the proposed Project would not result in increased aviation and/or passenger activity levels or capacity at LAX. This analysis is supported by substantial evidence as documented in Appendix B.1 of the Draft EIR. Please see Topical Response TR-ATMP-G-1 for further discussion of the validity of this forecast.

Nevertheless, in response to comments, Topical Response TR-ATMP-G-3 includes a general discussion of impacts in 2033 with and without the proposed Project for informational purposes. That analysis demonstrates that, in most cases, increases in impacts occurring in 2033, compared to 2028, would not be a result of the proposed Project but rather a result of changes in the environmental setting in which the impacts occur. Thus, there is no evidence that the proposed Project would cause greater impacts beyond 2028 than those disclosed in the Draft EIR. Accordingly, the commenter is incorrect that the Draft EIR's conclusion that airport operations would be the same with or without the proposed Project in any way undermines the analysis of alternatives.

Note also that the commenter has mischaracterized the number of new passenger gates that would result from the proposed Project. As indicated in Table 2-2 on page 2-38 of the Draft EIR, implementation of the proposed Project would result in up to 12 net new gates (not 29 new gates as stated by the commenter). These 12 net new gates account for the maximum number of gates that could be developed at Concourse 0 and Terminal 9, along with the elimination of 15 West Remote Gates and two gates at Terminal 1.

ATMP-AL010-60

Comment: Furthermore, instead of providing a "reasonable range" of feasible alternatives that would offer "substantial environmental advantages" over the Project, as CEQA requires, all of the DEIR's build alternatives allegedly would result in significant and unavoidable impacts, while none would appear to offer substantial environmental benefits over the proposed Project—not even the DEIR's "environmentally superior alternative,"

Alternative 4. This is the very definition of an unreasonable range of alternatives, and violates CEQA.

Response: Section 5.1 of the Draft EIR presents the CEQA requirements for identifying and evaluating alternatives within an EIR, as set forth in Section 15126.6 of the State CEQA Guidelines. As noted in that section, Section 15126.6 requires that an EIR include a discussion of a reasonable range of alternatives that would "avoid or substantially lessen any of the significant effects of the project." CEQA does not require an EIR to identify alternatives that would "offer substantial environmental advantages" as stated by the commenter. Section 5.4 of the Draft EIR presents eight alternatives to the proposed Project, including alternatives that would avoid or substantially reduce certain significant impacts associated with proposed Project. Section 5.5 provides an evaluation of the environmental impacts of the alternatives considered to be potentially feasible, as compared to the impacts of the proposed Project. Section 5.6 of the Draft EIR summarizes the impacts of each alternative and provides the basis for identifying the Environmentally Superior Alternative. While the No Project Alternative would avoid or substantially reduce most of the significant impacts of the Project, as indicated in Section 5.6.5, CEQA requires that when the No Project Alternative is the environmentally superior alternative, the EIR must also identify an environmentally superior alternative among the other alternatives. Section 5.6.5 provides the basis for why Alternative 4 (Approved LAMP Roadway Improvements plus Terminal 9 Access) was then selected as the environmentally superior alternative from among the other alternatives. In summary, the identification and evaluation of a reasonable range of alternatives to the Project were completed in accordance with the requirements of CEQA.

ATMP-AL010-61

Comment: Additionally, the DEIR relies on a misleading No Project Alternative designed to overstate the level of development and growth at LAX (and the associated impacts) that would occur with the absence of the Project.

Response: The content of this comment is similar to comment ATMP-AL010-65; please refer to Response to Comment ATMP-AL010-65.

ATMP-AL010-62

Comment: A. The Concourse 0 Only Alternative (Alternative 2) Is the Actual Environmentally Superior Alternative.

"An EIR's discussion of alternatives must contain analysis sufficient to allow informed decision making." *Habitat & Watershed Caretakers v. City of Santa Cruz* (2013) 213 Cal.App.4th 1277, 1302-03. The DEIR fails in this regard. Of the proposed Project and the three build alternatives, Alternative 2 has by far the smallest footprint and would add the fewest passenger gate and airfield improvements to LAX. Relying on the false narrative that operational impacts would be effectively the same with the Project or any of the alternatives (including the No Project Alternative), the DEIR magnifies a relatively

small difference between the Project and Alternative 2—namely, the air quality and GHG impacts from an alleged increase in airfield taxiing under Alternative 2, compared to the Project—in order to reach the absurd conclusion that Alternative 2 would have more impacts than the Project, even though it would entirely remove Terminal 9, its proposed 18 new passenger gates, and the proposed Taxiway C extension from the Project. DEIR at pp. 5-53 and 5-54 (alleged "new" Alternative 2 air quality impact); pp. 5-56 and 5-57 (alleged "new" Alternative 2 GHG impact).

The DEIR can only reach the conclusion that Alternative 2 has greater impacts than the Project by ignoring the proposed Project's significant, operational impacts through 2045, which would vastly exceed the alleged air quality and GHG impacts from increased taxiing under Alternative 2. See DEIR at p. 5-102 (concluding that air quality/GHG impacts with the one-terminal, 11-gate Alternative 2 would exceed air quality/GHG impacts under the 2-terminal, 27-gate proposed Project).

Because the DEIR systematically diminishes the actual impacts of the Project while exaggerating the implications of alleged "new" impacts under much smaller alternatives, the DEIR's alternatives analysis is fundamentally dishonest. For these reasons, moreover, the DEIR lacks substantial evidence that Alternative 2 is not the environmentally superior alternative—instead of Alternative 4, which would add a second terminal (Terminal 9) and would double the number of gates compared to Alternative 2.

Response: As explained above in Response to Comment ATMP-AL010-59 and in Topical Response TR-ATMP-G-3, there is no evidence that the proposed Project would cause greater impacts beyond 2028 than disclosed in the Draft EIR. Accordingly, there is no basis for the commenter's assertion that the Draft EIR's conclusion that Alternative 2 would have greater impacts than the Project ignores operational impacts beyond 2028. The commenter's assertion that more gates equals more impacts belies the fact that that the airport activity levels, including the number of annual aircraft operations and passenger levels at buildout of the Project in 2028 and 2033, will be the same with or without the additional gates associated with the proposed Project. That fact is noted on page 2-17 of the Draft EIR and is supported by the substantial evidence presented in Appendix B of the Draft EIR, as further discussed in Topical Response TR-ATMP-G-1. Please also see Response to Comment ATMP-AL010-47 for additional discussion of this topic. Because the aircraft activity levels will be the same with or without additional aircraft gates, the differences in air quality impacts between the proposed Project and the alternatives are primarily attributable to differences in the time and distance associated with aircraft taxiing to and from the gates associated with each alternative. As indicated in Section 5.5.2.1.1.2 of the Draft EIR, the omission of Terminal 9 under Alternative 2 would result in an increase in aircraft taxi time, estimated to be 8.5 percent greater compared to the proposed Project. That increase would result in a new significant and unavoidable impact with respect to local concentrations of nitrogen dioxide. That impact would not occur under Alternative 4; hence, it is not accurate that Alternative 2 is environmentally superior to Alternative 4. These conclusions are supported by substantial evidence in the record, including Section 5.5 of Chapter 5 and Appendix C of the Draft EIR.

ATMP-AL010-63

Comment: B. The DEIR Contains No Evidence that Would Support Rejection of Alternative 2.

To ensure that alternatives are properly assessed, CEQA "contains a 'substantive mandate' requiring public agencies to refrain from approving projects with significant environmental effects if 'there are feasible alternatives or mitigation measures' that can substantially lessen or avoid those effects." *Pres. Action Council*, 141 Cal.App.4th at 98; Pub. Resources Code § 21002. A lead agency may not reject an alternative unless the agency makes findings supported by substantial evidence showing that the alternative is infeasible. Pub. Resources Code §§ 21081(a), 21081.5; CEQA Guidelines §§ 15091(a)(3), 15092. Rejected alternatives must be "truly infeasible." *City of Marina v. Bd. of Trustees of Cal. State Univ*. (2006) 39 Cal.4th 341, 369. "Feasible" means "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors." CEQA Guidelines § 15364.

The alternatives analysis is so flawed that there is no way decisionmakers could lawfully reject Alternative 2 and approve the proposed Project instead. To summarize, LAWA asserts that the airport will be able to accommodate the current growth forecast regardless of the Project, and claims the Project is just needed to improve the "passenger experience." Relying on this falsehood, the DEIR also makes the implausible claim that environmental impacts would actually be higher if just Concourse 0 were built, compared to if both terminals were built. The notion that half of the Project would have greater impacts than the whole Project is absurd; as logic dictates, if you double a project's size, impacts will increase.

Nonetheless, even under these false premises, in order to approve the proposed Project LAWA still must demonstrate by substantial evidence that an alternative that is smaller than the full Project, for instance, Alternative 2, could not achieve the following objectives (DEIR at pp. 2-18 and 2-19):

• Provide for new modern, spacious, and efficient terminal facilities that support the ability to accommodate the projected future growth in passenger levels in a manner that offers operational flexibility
• Improve passenger experience, increase airlines' efficiency, and reduce busing activity on the airfield through the removal and replacement of most of the West Remote Gates
• Improve international and domestic passenger processing capabilities
• Provide additional connections to the APM system currently under construction
• Provide connections to adjacent terminals that will allow passengers to move between terminals without having to go back through security screening
• Complete construction prior to the 2028 Olympics.

The DEIR utterly fails in this regard. It contains no evidence which decisionmakers could rely on to conclude that a smaller Project, for instance Alternative 2 or a scaled-back version of both proposed new terminals, would not meet these Project objectives. CEQA requires agencies to explain their rejection of potentially feasible alternatives in a manner "sufficient to enable meaningful public participation and criticism." *Save Round Valley Alliance v. County of Inyo* (2007) 157 Cal.App.4th 1437, 1458. Courts have

repeatedly found that agencies fail to meet this standard when they reject alternatives based on unsupported conclusions. Id. at 1465; *Habitat & Watershed Caretakers*, 213 Cal.App.4th at 1305; *Center for Biological Diversity v County of San Bernardino* (2010) 185 Cal.App.4th 866, 884-85 (overturning FEIR in which an agency rejected an alternative based on unsupported, conclusory statements); *Pres. Action Council v. City of San Jose* (2006) 141 Cal.App.4th 1336, 1355 (finding that neither the EIR nor the supporting administrative record contained sufficient information to support the lead agency's finding that a reduced-size alternative was infeasible).

Unsurprisingly, the DEIR provides no data or metric with which the public or decisionmakers could determine that building Concourse 0 and Terminal 9, as proposed, would improve the LAX "passenger experience" more effectively than just building Concourse 0, or a different scaled-back version of the Project. As explained in Part I, LAWA also cannot claim that the proposed Project is needed in order to replace some or all of the West Remote Gates. LAWA has already committed to decommissioning the WRGs once the MSC is completed, and furthermore assumed the draw-down of the WRGs, and a corresponding reduction in impacts, in the CEQA review for the MSC program and MSC North project. See generally MSC Program DEIR.

The DEIR furthermore contains no evidence for why additional passenger gates are necessary to improve the passenger experience. The DEIR lacks evidence that any of the alternatives could not adequately serve Olympics-related travel in 2028. Further, as explained earlier, the DEIR lacks evidence that under current pandemic conditions the Project could be completed by 2028; thus, none of the alternatives could be rejected in favor of the Project for this reason, either.

"To facilitate CEQA's informational role, the EIR must contain facts and analysis, not just the agency's bare conclusions or opinions." *Habitat & Watershed Caretakers*, 213 Cal.App.4th at 1303. Under CEQA, LAWA must show by substantial evidence why the Project as proposed is necessary to achieve the objectives, as opposed to something smaller. The DEIR lacks any data or meaningful analysis on which a decisionmaker could reasonably rely to reject Alternative 2 or a different scaled-back version of the Project.

Response: The commenter's statements about the Draft EIR's analysis of Alternative 2 are flawed in several respects. Please refer to Response to Comment ATMP-AL010-47 and Topical Response TR-ATMP-G-1 for an explanation of the validity of the Draft EIR's conclusion that the airport could accommodate the same level of passenger and aircraft activity in 2028 with or without the Proposed Project. The commenter offers no support for the notion that "if you double a project's size, impacts will increase." In contrast, the Draft EIR provides comprehensive detailed analyses of the full array of environmental topics that take into account the size, nature, and location of the improvements associated with the proposed Project and with each alternative. For example, and as discussed above in Response to Comment ATMP-AL010-62, although the amount of new terminal area developed under Alternative 2 would be less than that of the proposed Project, with the omission of Terminal 9, aircraft would have to taxi longer distances than they would with the proposed Project. This would increase nitrogen dioxide concentrations compared to the proposed Project, as documented in the Draft EIR.

Regarding the claim that there is no evidence for why additional passenger gates are necessary to improve the passenger experience at LAX, Section 2.3.1.1.2 of the Draft EIR indicates that the development of Concourse 0 and Terminal 9 would provide new facilities with direct access to passenger processing capabilities, including for international travel, and a high-quality of passenger service, which the West Remote Gates do not provide. Also, locating the new replacement gates within a new concourse or terminal that is connected to other existing terminals at LAX would allow passengers with connecting flights to more easily and more quickly move between gates. More specifically, Concourse 0 would connect directly with Terminal 1, which, in turn, will connect with Terminal 2 as part of a future fully-linked terminal system within the CTA. Similarly, Terminal 9 would connect with Terminal 8 via the proposed pedestrian corridor over Sepulveda Boulevard. Terminal 8 currently connects directly with Terminal 7 as part of a connected terminal system on the south side of the CTA that provides a continuous passenger corridor between Terminal 8 and the Tom Bradley International Terminal. Concourse 0 and Terminal 9 would provide a complementary relationship between the existing adjacent terminals within the CTA, as opposed to the disconnected, isolated nature of the West Remote Gates. Therefore, it is not simply the addition of new passenger gates that would improve the passenger experience, but rather it is the number, location, and types of gates that are provided, along with how those gates are integrated with the other existing and proposed gates and operations within the CTA, that would serve to improve the passenger experience. These considerations are presented in the Draft EIR.

The commenter presupposes that LAWA's decision-makers would reject Alternative 2 in favor of the proposed Project. At the time of writing of this response, the Board of Airport Commissioners (BOAC) has yet to render a decision on the proposed Project or any of the alternatives presented in the Draft EIR. As required by Section 21081 of CEQA and Section 15091 of the State CEQA Guidelines, prior to approving the proposed Project or any alternative, the BOAC would consider and adopt written findings supporting its decision, which would be supported by substantial evidence in the record. At that time, the BOAC will consider the ability of each alternative to meet the Project objectives in light of the environmental impacts of each alternative as compared to the impacts of the proposed Project, including Alternative 2 - Concourse 0 Only Alternative, and Alternative 3 - Terminal 9 Only Alternative, both of which have a smaller footprint than the proposed Project.

With respect to the commenter's allegations regarding decommissioning of the West Remote Gates and other related assertions, please refer to Topical Response TR-ATMP-G-2.

ATMP-AL010-64

Comment: C. The DEIR Fails to Analyze a Reasonable Range of Alternatives.

Under CEQA, an EIR must consider a "reasonable range" of alternatives to the proposed project which (1) offer substantial environmental advantages over the proposed Project (Pub. Resources Code § 21002), and (2) may be "feasibly accomplished in a successful

manner" considering the economic, environmental, social and technological facts involved. *Habitat & Watershed Caretakers*, 213 Cal.App.4th at 1302-03. A proper analysis of alternatives is essential for LAWA to comply with CEQA's mandate that significant environmental damage be avoided or substantially lessened where feasible. Pub. Resources Code § 21002; CEQA Guidelines §§ 15002(a)(3), 1501(a)(2), 15126.6(a); see *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 565-65.

The DEIR carries over four alternatives from an original seven considered at the Project scoping stage. DEIR at pp. 5-6 through 5-11. One of these is the obligatory No Project Alternative, discussed in the following section. Each of the three remaining "build" alternatives—the "Concourse 0 Only Alternative" (Alternative 2), the "Terminal 9 Only Alternative" (Alternative 3), and the "LAMP Roadway Improvements plus Terminal 9 Access Alternative" (Alternative 4)—is essentially a variant on the theme of the Proposed project; each merely excises one major component of the proposed Project.

Despite CEQA's mandate that the Project alternatives "offer substantial environmental advantages over the proposed Project," LAWA has failed to do this here. *Habitat & Watershed Caretakers*, 213 Cal.App.4th at 1302-03. The DEIR asserts that other than the No Project Alternative, only one of the alternatives, Alternative 4, would reduce the Project's significant impacts at all. Moreover, it would merely "reduce the severity of a significant but mitigable impact related to [roadway] construction noise and would slightly reduce the severity of the significant and unavoidable impact associated with increased passenger VMT." DEIR at p. 5-102. In other words, Alternative 4, the "environmentally superior alternative" would not even reduce any Project impacts below the threshold of significance; all significant and unavoidable Project impacts would remain significant and unavoidable under Alternative 4. DEIR, Table 5-15.

With this DEIR, LAWA has inverted the purpose of the alternatives analysis. Instead of seeking out feasible alternatives that would offer "substantial environmental advantages" over the Project, as CEQA requires, LAWA has tweaked the proposed Project just enough with one alternative so that two significant impacts that would occur with the Project would be "slightly" reduced. All of the build alternatives would result in significant and unavoidable impacts, while none would offer substantial environmental benefits over the proposed Project, not even the "environmentally superior alternative." See id. This is the very definition of an unreasonable range of alternatives, one in which the agency's unwavering commitment to the proposed Project, rather than the reduction in significant and unavoidable impacts, is the guiding principle.

Under CEQA, project objectives cannot be so narrowly defined that they preclude consideration of reasonable alternatives for achieving the project's underlying purpose. *North Coast Rivers Alliance v. Kawamura* (2015) 243 Cal.App.4th 647, 668. See also *County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 203 (EIR for expansion of groundwater extraction program failed to consider water conservation as alternative to increased groundwater extraction); *Habitat & Watershed Caretakers*, 213 Cal.App.4th at 1302 (EIR for a proposal to supply water to expand a university campus was deficient because it failed to discuss a limited service alternative that could partially achieve project objectives).

The DEIR must be revised and recirculated with a legally adequate range of alternatives, including one or more "scaled back" versions of the Project that would, among other things, address the longstanding imbalance of widebody commercial and heavy cargo operations on the south airfield. See *Habitat & Watershed Caretakers*, 213 Cal.App.4th at 1302. For reasons discussed throughout these comments, the revised EIR should also analyze an alternative that delays construction of either or both of the proposed terminals until recovery from the global COVID-19 pandemic is fully underway and a fuller picture of the pandemic's impact on the aviation sector is available.

Response: The Draft EIR identifies and evaluates a reasonable range of alternatives appropriate for the proposed Project. As noted by the commenter and as reflected in Table 5-15 of the Draft EIR, the No Project Alternative would avoid several of the significant impacts associated with the proposed Project; however, such avoidance of significant impacts is only related to the construction-related impacts. Any of the build alternatives (i.e., Alternatives 2 through 4) would result in unavoidable significant impacts, particularly as related to air quality impacts from construction activities. Section 5.4.1.3 of the Draft EIR describes an alternative construction approach that would avoid or substantially lessen the significant construction-related air quality and GHG emission impacts of the proposed Project. As described therein, implementation of such an alternative would limit daily construction activities to no more than approximately 2.9 hours per day in order for daily peak emissions to be below the applicable threshold of significance. Based on such a construction restriction, it would take approximately 58 years to complete Project construction, which would be impractical and, therefore, that alternative was rejected from further consideration in the Draft EIR. Regarding significant impacts associated with Project operations, all of the alternatives, even the No Project Alternative, would result in significant impacts. That is primarily due to the fact that the number of annual aircraft operations and passenger levels at LAX in 2028, the projected buildout year for the proposed Project, would be greater than existing conditions regardless of whether the proposed Project or one of the Project alternatives, including the No Project Alternative, were selected for implementation, as further documented in Section 2.3.1.2.2 of the Draft EIR, Appendix B.1 of the Draft EIR, and Topical Response TR-ATMP-G-1. The specifics of how those future activity levels are accommodated under each alternative is the basis for how impacts would differ from those of the proposed Project. For example, while the number of annual aircraft operations in 2028 would be the same with or without the proposed Project or any of the Project alternatives, the routes aircraft would take to taxi between the runways and the future gates locations under each alternative, and the efficiency of those routes, would make a difference in the resultant air pollutant and greenhouse gas emissions from the aircraft. Those types of differences in impacts attributable to the specifics of each alternative were evaluated and are presented in the Draft EIR.

The commenter infers that the Project objectives are narrowly defined, thereby precluding consideration of reasonable alternatives for achieving the proposed Project's underlying purpose. Section 2.3.2.1 of the Draft EIR includes a broad list of objectives for the proposed Project. Project objectives are provided for each of the primary Project elements – airfield improvements, terminal improvements, and roadway system improvements – and multiple objectives are identified for each Project element. Four additional objectives are provided that apply to the Project as a whole.

The commenter concludes with the assertion that the Draft EIR must be revised and recirculated to include one or more "scaled back" versions of the Project. The Draft EIR already includes two scaled-back versions of the proposed Project, specifically Alternative 2, Concourse 0 Only Alternative, and Alternative 3, Terminal 9 Only Alternative. While there might be other possible variations of a scaled-back alternative, an EIR need not consider every conceivable alternative to the project. (In re *Bay-Delta Programmatic Environmental Impact Report Coordinated Proceedings* (2008) 43 Cal.4th 1143, 1163.) Rather, an EIR must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. (State CEQA Guidelines Section 15126.6(a).) It must include information sufficient to permit a reasonable choice of alternatives so far as environmental consequences are concerned. (*Village Laguna of Laguna Beach, Inc. v. Board of Supervisors* (1982) 134 Cal.App.3d 1022, 1029.) Here, the LAX Airfield and Terminal Modernization Project alternatives constitute a reasonable range, sufficient to allow informed decision-making. (See *City of Maywood v. Los Angeles Unified School District* (2012) 208 Cal.App.4th 362, 419.) Therefore, revision and recirculation of the Draft EIR is not warranted.

Regarding the commenter's assertion of an airfield imbalance, please see Response to Comment ATMP-AL010-17, which addresses that allegation. Regarding the commenter's reference to recovery from the global COVID-19 pandemic, please see Topical Response TR-ATMP-G-1, which discusses the aviation demand forecast for LAX including as related to recovery from the COVID-19 pandemic. For the reasons explained therein, it is not necessary or appropriate for the EIR to analyze an alternative that delays construction of either or both of the proposed terminals until recovery from the COVID-19 pandemic.

ATMP-AL010-65

Comment: D. The Alternatives Analysis Relies on a Misleading No Project Alternative.

The DEIR is fundamentally flawed in its characterization and analysis of the No Project Alternative. LAWA's description and analysis of the No Project Alternative appears to have been carefully engineered to overstate the level of development and growth at LAX (and the associated impacts) that would occur with the absence of the Project. This approach fails to satisfy CEQA's requirements of a no project analysis and amounts to a major legal flaw.

The purpose of a discussion of the No Project Alternative is to allow a comparison of the environmental impacts of approving the proposed Project with the effects of not approving it. CEQA Guidelines §15126.6(e)(1). The No Project Alternative must be a fact-based forecast of the environmental effects of maintaining the status quo. *Center for Biological Diversity v. Department of Fish & Wildlife* (2015) 234 Cal.App.4th 214, 253; *Planning & Conserv. League v. Castaic Lake Water Agency* (2009) 180 Cal.App.4th 210, 247. See *Planning & Conserv. League v. Department of Water Resources* (2000) 83 Cal.App.4th 892, 917 (no-project alternative is necessary to provide decision-makers and public with basic information they can use to measure environmental advantages and disadvantages of project). Moreover, the No Project Alternative's analysis of future

conditions should describe any significant contingencies likely to affect its projections. Id. at 913.

Like the "gating analysis" and the Without Project scenario discussed in Part II.F, LAWA's No Project Alternative assumes the construction of 8 gates at MSC South, despite the fact that the MSC South Project has not been approved yet. DEIR at p. 5-15 (stating that under the No Project Alternative the MSC South would provide a "new 95,000-square-foot concourse" and "up to eight aircraft gates," and associated airfield improvements). The No Project Alternative further errs by assuming that the current 18 WRGs will still be operating as a bus gate facility indefinitely. DEIR at p. 5-12 (stating that under the No Project Alternative "the existing 18 [WRGs] would not be removed/decommissioned and "[p]assengers would still be bused to and from the [WRGs] from the CTA."). However, LAWA has repeatedly committed to decommissioning all of the WRGs once the MSC is built. Thus the No Project Alternative cannot assume the simultaneous operation of both the 23-gate MSC and the 18 WRGs, to make it look as though the airport without the Project could accommodate the same level of growth, and would have the same environmental impacts, as if the Project were approved.

By padding the No Project Alternative with at least 18 additional gates that would not actually exist in 2028 or after, LAWA violates CEQA's requirement to provide a fact-based forecast of the environmental effects of maintaining the status quo. *Center for Biological Diversity*, 234 Cal.App.4th at 253. Furthermore, for the numerous reasons explained in Part II, the DEIR lacks evidence for the statement that "the projected future passenger levels in 2028 under the No Project Alternative would be the same as for the proposed Project." DEIR at p. 5-12.

Furthermore, even if the 18 WRGs and 23-gate MSC were to stay in the No Project Alternative, the DEIR still would fail to account for the reasonable possibility that the additional 12 passenger boarding gates that would allegedly occur with the Project (see DEIR, Appendix B.2, Table 2-1) could enable increased public health vigilance at terminals in a post-pandemic aviation sector, which would not be possible under the No Project Alternative. As explained earlier, LAWA's approach of assuming, without evidence, a complete return to 2019 conditions (i.e., a pre-pandemic aviation sector) by 2028 violates the CEQA requirement that the No Project Alternative describe any significant contingencies likely to affect its projections. Id. at 913. *Planning & Conserv. League*, 83 Cal.App.4th at 913.

In sum, LAWA must correct the deficiencies in the No Project Alternative as part of a revised and recirculated DEIR.

Response: In accordance with Section 15126.6(e)(3)(C) of the State CEQA Guidelines, the No Project Alternative, as characterized in Chapter 5 of the Draft EIR, includes improvements at LAX that represent what would reasonably be expected to occur in the foreseeable future if the proposed Project were not approved, based on current plans. The inclusion of these improvements is based on facts and publicly-available information. The improvements included in the No Project Alternative are projects or components of projects that have been approved by LAWA and, where required, by FAA, and many of these improvements are already under construction or are recently completed. As described in the

introduction to Chapter 4 of the Draft EIR, with limited and appropriate exceptions, the Draft EIR used an existing conditions baseline (2018 or 2019) to analyze impacts related to future passenger and aircraft activity levels and to determine the level of significance of these impacts. Therefore, LAWA would not gain any advantage by "engineering" the No Project Alternative to "overstate the level of development and growth at LAX (and the associated impacts) that would occur with the absence of the Project," as alleged by the commenter. The commenter provides no evidence, and there is none, that any of the activities assumed in the No Project Alternative would not occur if the proposed Project were not approved.

Please see Topical Response TR-ATMP-G-2 regarding the approval status of Phase 2 of the MSC Program (i.e., MSC South) and the future use and decommissioning of the West Remote Gates. As demonstrated in the topical response, the commenter's assertion that the eight gates assumed at MSC South in the Draft EIR have not been approved is incorrect and inclusion of the gates as part of the No Project Alternative is appropriate, as they will be constructed regardless of whether or not the LAX Airfield and Terminal Modernization Project is implemented. Moreover, as discussed in the topical response, it is reasonable and appropriate for the No Project Alternative to assume the continued operation of the 18 West Remote Gates. Please see Response to Comment ATMP-AL010-47 and Topical Response TR-ATMP-G-1 for a discussion of airport activity in 2028 with and without implementation of the proposed Project. As demonstrated in those responses, the Draft EIR includes substantial evidence for the conclusion that projected future activity levels in 2028 would be the same under the proposed Project and the No Project Alternative.

With regards to the comments concerning the relationship of the COVID-19 pandemic and the No Project Alternative assumptions, it is purely speculative to state, as the commenter does, that the proposed Project "could enable increased public health vigilance at [LAX] terminals in a post-pandemic aviation section, which would not be possible under the No Project Alternative." This statement is not supported by any evidence. Moreover, even if the proposed Project could enable increased public health vigilance as compared to the No Project Alternative, it is unclear how this would affect projections of passenger and aviation activity in 2028 or result in any differences in the environmental impacts associated with the proposed Project or the No Project Alternative identified in the Draft EIR.

The commenter states that LAWA has assumed a complete return to 2019 conditions by 2028 and that this assumption violates the CEQA requirements that the No Project Alternative describe any significant contingencies likely to affect its projections. The Draft EIR acknowledged uncertainties in future conditions in a preamble included on the first page of the Draft EIR. Therefore, the Draft EIR describes significant contingencies that may affect the projections associated with both the proposed Project and the No Project Alternative. Moreover, LAWA has not assumed a return to 2019 conditions by 2028; rather, LAWA has projected that both passenger activity and aircraft operations will grow between 2019 and 2028. For a discussion of the validity of these assumptions in light of the COVID-19 pandemic, and uncertainties associated with the anticipated post-COVID-19 pandemic recovery, please see Topical Response TR-ATMP-G-1 and Response to Comment ATMP-AL010-10. As explained in Topical Response TR-ATMP-G-

1, it is expected that the projected demand for passengers and aircraft operations documented in the Draft EIR could be delayed by up to 6 years, although demand and operations could recover earlier than that. The uniqueness of the COVID-19 pandemic situation and the rapidly evolving dynamics of air travel recovery, both domestically and internationally, present substantial uncertainties. However, for reasons described in the preamble to the Draft EIR and in Response to Comment ATMP-AL010-10, the assumptions in the Draft EIR regarding conditions in 2028 under the No Project Alternative are still valid and relevant for purposes of the LAX Airfield and Terminal Modernization Project environmental analyses, and there is no reasonable basis for changing the No Project Alternative assumptions or the related Draft EIR analysis due to the COVID-19 pandemic. To apply the uniqueness of the COVID-19 pandemic to future No Project Alternative conditions in 2028 would be speculative, and would not provide the public and decision-makers with meaningful information regarding the potential environmental impacts of the LAX Airfield and Terminal Modernization Project in the absence of the proposed Project.

In sum, the Draft EIR's analysis of alternatives, including the No Project Alternative, is adequate and complies with CEQA in all respects.

In preparing the Final EIR for the proposed Project, LAWA has reviewed all of the comments received, including this comment, and has carefully considered the responses to these comments and other information provided in the LAX Airfield and Terminal Modernization Project Final EIR. None of the information provided in the Final EIR meets the criteria for recirculation of an EIR as outlined in Section 15088.5 of the State CEQA Guidelines.

ATMP-AL010-66

Comment: V. The Environmental Impacts Analysis in Chapter 4 of the DEIR Is Deficient in Numerous Respects.

For the numerous reasons explained in Part II of this letter, the DEIR's failure to acknowledge the Project's effect on LAX's operational capacity, and the associated environmental impacts, through 2045 results in a fundamentally flawed analysis for each impact area. By concluding that the Project would result in significant and unavoidable impacts in almost every impact area, while at the same time asserting that these significant/unavoidable impacts are not really due to the Project because they allegedly would happen anyway as a result of increased demand for air travel, LAWA thumbs its nose at CEQA's informational purpose. The DEIR's underlying strategy is to deflect a legal challenge while openly signaling to the decisionmakers that by approving the Project based on override findings, their hands would be clean of adverse environmental consequences. As explained, LAWA's strategy does not insulate it from a CEQA lawsuit because the DEIR conceals the true magnitude and duration of the Project's significant and unavoidable impacts by, among other things, cutting off the impact analysis at 2028.

Response: The Draft EIR meets CEQA's requirements for analysis of environmental impacts from the proposed Project. Please see Topical Response TR-ATMP-G-3 regarding the bases for

why 2028 is the appropriate horizon year for evaluating the impacts of the proposed Project, and not 2045 as an impacts analysis horizon year.

The commenter's statement that the "Project would result in significant and unavoidable impacts in almost every impact area" is incorrect. As summarized in Section 1.4.1 and Section 6.1 of the Draft EIR, the proposed Project would result in significant and unavoidable impacts with respect to air quality, specifically construction emissions, operational emissions, and operational concentrations; greenhouse gas emissions; aircraft noise; and transportation, specifically passenger vehicle miles traveled (VMT), induced VMT, and cumulative VMT impacts. As identified in Table 1-2 of the Draft EIR, the proposed Project would result in less than significant impacts to construction-related air quality concentrations, human health risk, cultural (historical) resources, energy, hazardous materials, land use and planning, roadway traffic noise, construction traffic and equipment noise and vibration, and employee VMT. Further, as summarized in Section 6.4 of the Draft EIR, the Initial Study for the proposed Project, included as Appendix A of the Draft EIR, determined that the proposed Project would result in no impact, or less than significant impacts, to aesthetics, agricultural and forestry resources, biological resources, geology and soils, hydrology and water quality, mineral resources, population and housing, public services, recreation, tribal cultural resources, and wildfire.

The commenter's allegation that the Draft EIR asserted that "significant/unavoidable impacts are not really due to the Project because they allegedly would happen anyway" is incorrect. Rather, the Draft EIR compares the changes in the physical environment resulting from the Project at buildout in 2028 to the existing environmental baselines, with limited and appropriate exceptions as described in the introduction to Chapter 4 of the Draft EIR, to determine whether the Project would result in significant impacts. As stated above, the Draft EIR concluded that several impacts would be significant and unavoidable despite implementation of all feasible mitigation. (See, e.g., the discussion of Impact 4.7.1-1 in Section 4.7.1.5.1 of the Draft EIR.) Additionally, and for informational purposes only, the Draft EIR also includes a comparison of environmental conditions in 2028 with Project implementation to environmental conditions in 2028 without the Project with respect to air quality, human health risk, greenhouse gas emissions, and aircraft noise. With regards to the commenter's allegations regarding the Draft EIR's underlying strategy, please see Response to Comment ATMP-AL010-28.

It should be noted that LAWA has attempted to work with the commenter, as well as with other stakeholders, to address concerns as they arise. LAWA's record reflects these efforts with respect to addressing managing construction activities, supporting funding for the installation of residential sound insulation to address aircraft noise, approving and constructing the LAX Landside Access Modernization Program, including the Automated People Mover as a means of encouraging transit and reducing congestion in the Central Terminal Area, and other initiatives. LAWA will continue to support these efforts.

ATMP-AL010-67

Comment: A. The DEIR's Approach to Mitigation Violates CEQA and Provides Inadequate Commitments to Enforceable Mitigation Measures.

An EIR must identify feasible mitigation measures to reduce or avoid significant environmental impacts. CEQA Guidelines §15126.4. Under CEQA, "public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects. . . ." Pub. Resources Code § 21002; see also id., § 21081 (no agency "shall approve or carry out a project" that will cause significant effects unless it finds that all feasible mitigation measures or alternatives have been adopted).

Additionally, the primary goal of an EIR is to identify a project's significant environmental impacts and find ways to avoid or minimize them through the adoption of mitigation measures or project alternatives. Id., §§ 21002.1(a), 21061. The lead agency must adopt all feasible mitigation measures that can substantially lessen the project's significant impacts, and it must ensure that these measures are enforceable. Id., § 21002; CEQA Guidelines § 15002(a)(3), 15126.4(a)(2); *City of Marina v. Bd. of Trustees of the Cal. State Univ.* (2006) 39 Cal.4th 341, 359, 368-69. The requirement for enforceability ensures "that feasible mitigation measures will actually be implemented as a condition of development, and not merely adopted and then neglected or disregarded." *Federation of Hillside and Canyon Assns. v. City of Los Angeles* (2000) 83 Cal.App.4th 1252, 1261 (italics omitted); CEQA Guidelines § 15126.4(a)(2). The DEIR fails to comply with these requirements.

First, LAWA relies on previously approved mitigation measures that have yet to be implemented from the Master Plan. For example, LAWA has relied on a version of MM-AN (ATMP)-1 since adopting the 2004 LAX Master Plan, but has yet to complete this mitigation measure. LAWA cannot rely on this mitigation measure without an enforceable schedule and commitment to complete the Residential Sound Insulation ("RSI") program, particularly in El Segundo. Without such a plan, the mitigation measures fails to be enforceable and specific enough for LAWA to rely on, especially in light of LAWA's failed commitment to this mitigation measure since 2005.

Response: The Draft EIR's approach to mitigation complies with CEQA. LAWA initiated a Residential Sound Insulation Program in the 1990s. Since that date, substantial progress has been made in completing sound insultation on residential uses significantly impacted by LAX aircraft operations, including in the City of El Segundo. The residential sound insulation (RSI) program is voluntary; jurisdictions and residents cannot be forced to participate but must opt into the program. Most of the affected areas are in municipal jurisdictions that directly implement and manage their own sound insulation programs. Due to the voluntary nature of the program, and the central role of local jurisdictions, LAWA cannot provide a specific "enforceable schedule" to complete the RSI program.

The City of El Segundo initiated its own sound insulation program in 1997 and subsequently received over $100 million in funding support from LAWA and the FAA. In 2016, the City of El Segundo suspended, and in 2018 terminated, its program. El Segundo

requested that LAWA assume responsibility for administering the voluntary program in the City of El Segundo. Please see Response to Comment ATMP-AL010-96 for additional information on that topic, including steps taken by LAWA since the City of El Segundo terminated its program in 2018.

Information on RSI programs is available at https://www.lawa.org/lawa-environment/noise-management/sound-insulation-grant-program.

ATMP-AL010-68

Comment: Second, MM-AQ/GHG (ATMP)-2 is another example of recycled mitigation from previous projects that is not enforceable. In the Terminals 2 & 3 Modernization Project Mitigation Monitoring Reporting Program 2019 Annual Progress Report (June 2020), LAWA notes that a similar mitigation measure, MM-AQ (T2/T3)-1, requiring the use of renewable diesel fuel, showed no evidence of compliance in 2019. T2 & 3 MMRP 2019 Annual Progress Report at p. 8.[39] In that same report, LAWA assures that this requirement will be met in 2020, but does not provide any specific, enforceable measures to this effect for the Project.

The following sections discuss numerous additional, fatal errors with the mitigation measures LAWA proposes for the Project.

[39] Available at https://www.lawa.org/-/media/lawa-web/lawa-our-lax/studies-and-reports/mitigation-monitoring/terminals-2-and-3/2019-t2-t3-mmrp-report_final; last accessed Feb. 9, 2021.

Response: LAWA is committed to the fulfilment of mitigation measures adopted for LAX development projects, and is open and transparent about the implementation status of those measures. While not required under CEQA, LAWA compiles comprehensive annual reports on the implementation status of all mitigation measures for LAX development projects, and makes those reports available to the public, including on LAWA's website (see https://www.lawa.org/lawa-our-lax/studies-and-reports/mitigation-monitoring-reporting-program). Implementation of the mitigation measure related to the use of renewable diesel fuel in construction equipment and trucks encountered logistical and availability problems in 2019, including the distance to the nearest fueling station that offered renewable diesel fuel (which was located approximately 11 miles from LAX) and difficulties contractors encountered in finding mobile fueling service companies that carried renewable diesel fuel. As the production and availability of renewable diesel fuel has continued to evolve and improve over the last two years, the prime contractor on the Terminal 2/Terminal 3 Modernization Project has instituted measures to better enable the project to achieve the mitigation measure goal of 90 percent of the total diesel fuel demand being provided through the use of renewable diesel fuel. Such measures include the placement of a fuel storage tank in the project construction laydown area that will contain only renewable diesel fuel for the fueling of project equipment and trucks and contracting with a mobile fueler service company(s) that will provide renewable diesel fuel. Mitigation Measure MM-AQ/GHG (ATMP)-2, which is

proposed in the LAX Airfield and Terminal Modernization Project Draft EIR, is a feasible and enforceable measure, particularly in light of these improvements in the availability of renewable diesel fuel.

Responses to the commenter's other comments regarding mitigation measures are provided in the appropriate responses below.

ATMP-AL010-69

Comment: B. The DEIR's Noise Impact Analyses Is Flawed.

Because the DEIR takes the flawed position that the Project will not contribute at all toward higher passenger capacity or aircraft operations at LAX, the DEIR does not include any meaningful analysis of the Project's operational noise impacts. The exclusion of any significance determination or analysis regarding the Project's noise impact through 2045, and the individual and cumulative impacts on people at LAX and adjoining neighborhoods, is a fatal flaw. The DEIR must be revised to resolve this obvious deficiency under CEQA.

Response: As explained in the following responses, the Draft EIR's analysis of noise impacts complies with CEQA. With respect to the commenter's assertions that the Draft EIR's aviation forecast analysis is flawed, please see Section 2.3.1.2.2 of the Draft EIR. As explained there, the annual activity forecast and regression analysis prepared by LAWA's aviation experts determined that aircraft operations would be the same in 2028 with or without the proposed Project, and that the proposed Project would not result in increased aviation and/or passenger activity levels or capacity at LAX. This analysis is supported by substantial evidence as documented in Appendix B.1 of the Draft EIR. Please Topical Response TR-ATMP-G-1 for further discussion of the validity of this forecast.

With respect to the comment that the Draft EIR should have analyzed impacts out to 2045, please see Topical Response TR-ATMP-G-3 regarding the reasons why 2028 is the appropriate horizon year for evaluating the impacts of the proposed Project. Please also see Responses to Comments ATMP-AL010-31 through ATMP-AL010-46 regarding allegations that implementation of the proposed Project would relieve capacity constraints and would induce additional growth at LAX beyond 2028.

ATMP-AL010-70

Comment: Furthermore, the DEIR's complete reliance on already-existing mitigation measures, which would fail to mitigate the Project's noise impacts, is not enough. Existing measures were not designed to mitigate noise from the passenger and operations levels that the Project will enable by 2045. Because LAWA has not justified its claim that the Project would not cause any impacts related to higher passenger levels or aircraft operations, the DEIR must be revised to include an analysis of the aviation noise impacts caused by

the Project, and cumulative aviation noise impacts of other past, present or reasonably foreseeable future projects.

Response: Please see Topical Response TR-ATMP-G-3 regarding the reasons why 2028 is the appropriate horizon year for evaluating the impacts of the proposed Project. Please also see Responses to Comments ATMP-AL010-31 through ATMP-AL010-46 regarding allegations that implementation of the proposed Project would relieve capacity constraints and would induce additional growth at LAX beyond 2028 and Topical Response TR-ATMP-G-1 for further discussion of the validity of LAWA's aviation forecast.

Please see Response to Comment ATMP-AL010-11 regarding noise and baseline.

ATMP-AL010-71

Comment: The DEIR's failure to provide real analysis of noise impacts from the Project's construction is another fatal flaw. Haul trucks, in particular, can be quite noisy. The revised DEIR must identify sensitive receptors along haul routes and evaluate how increases in noise from the Project's construction activities will impact these receptors.

Response: Figure 4.7.3-1 and Table 4.7.3-1 of the Draft EIR identify and describe representative types of noise-sensitive receptors located in the vicinity of construction areas for the proposed Project. See Response to Comment ATMP-AL010-72 for a discussion of noise impacts along haul routes.

ATMP-AL010-72

Comment: The revised analysis must also disclose the increase in noise levels from the cumulative increase in haul trucks from all of the other past, present and future projects identified in the DEIR.

Response: Cumulative construction traffic noise impacts are discussed in Section 4.7.3.6.1 of the Draft EIR. As discussed therein, the geographical area of the cumulative impacts analysis includes the proposed haul routes that are located in proximity to noise-sensitive receptors. Table 3-1 in Chapter 3, Overview of Project Setting, identifies development projects at or adjacent to LAX. These projects are shown in Figure 3-1. Of the projects identified on Table 3-1, those whose construction traffic would be most likely to use the same roads as the proposed Project due to their location include the LAX Northside Development, Terminals 2 and 3 Modernization Project, and the LAX Landside Access Modernization Program. Although the cumulative development projects would employ construction traffic management techniques, such as designating construction routes along arterials and away from local streets, the combination of these cumulative projects and the proposed Project would result in increased construction-related traffic on roadways within the Project area. These cumulative trips would add to construction traffic-related noise at nearby noise-sensitive receptors. However, the cumulative increase in construction related traffic would not result in a doubling of existing daily traffic volumes on any area roads. As noted in Section 4.7.3.5.1.1, construction traffic

routes would be located along major roadways such as those listed in Table 4.7.3-4. Major roadways with the most notable potential for having cumulative construction traffic from other development projects at or adjacent to LAX that would combine with construction traffic from the proposed Project include Westchester Parkway relative to LAX Northside Development, Sepulveda Boulevard and Century Boulevard relative to the LAX Landside Access Modernization Program, and 96th Street relative to the LAX Landside Access Modernization Program. As indicated in Table 4.7.3-4, existing daily traffic volumes on those roads range from 15,880 vehicles on 96th Street to 54,220 vehicles on Century Boulevard. As described in Section 4.7.3.5.1.1, the combined peak daily vehicle trip generation of Project-related construction workers and trucks (multiplied time 2.5 for "passenger car equivalent" traffic volumes) is 3,225 daily trips. Even with a very conservative assumption that those trips would not be distributed onto different roadways, it is not anticipated that additional construction traffic from the aforementioned cumulative projects would result in a doubling of traffic on the subject construction traffic routes. Therefore, the increase in noise levels from cumulative construction-related traffic would not exceed 3 dBA CNEL and cumulative construction traffic noise impacts would be less than significant.

ATMP-AL010-73

Comment: 1. The Noise Generated by LAX Is of Utmost Concern to the Public and Deserves a Very Careful Analysis.

Noise is one of the most obvious deleterious effects of LAX, yet the DEIR fails on several fronts to provide adequate information on this central issue. A considerable amount of study and research has been conducted to understand the effects of high noise levels on communities. For those who live near airports, noise from departing and arriving aircraft has been shown to be a constant source of distress, interfering with normal speech, interrupting sleep, and disputing a ride range of activities. Studies also show that in addition to lifestyle disruption, there is a relationship between noise and the health of community residents, with high noise levels as a potential factor in hypertension, cardiovascular disorders, and gastrointestinal disturbances.

Response: Please see Topical Response TR-ATMP-N-1 regarding health effects of noise.

ATMP-AL010-74

Comment: LAX poses an extraordinary noise burden on its neighbors. Residents, employees and students in the LAX environs suffer daily from the barrage of aircraft overflights. Residents living within the LAX air corridor have long complained about intrusive aircraft noises. Given the severity of the existing noise problem and the significant increase in aircraft operations that will result from the proposed Project, it is essential that the DEIR provide a complete and accurate picture of the Project's impacts on noise levels in the surrounding community. Instead, as detailed below, the DEIR's analysis of noise impacts is flawed in several respects, with the result that the public and decisionmakers cannot

evaluate the severity or extent of the noise impact upon the affected communities. For example, the DEIR masks the Project's noise impacts by focusing on the Project's effect on average noise levels, rather than individual noise events.

Response: Existing aircraft noise levels associated with the operation of LAX are addressed in Section 4.7.1.3 of the Draft EIR. The commenter is incorrect in asserting that there will be a significant increase in aircraft operations that will result from the proposed Project. Implementation of the proposed Project would not result in more aircraft operations at LAX than would otherwise occur without the Project. With regard to future aircraft noise levels at LAX, as discussed on page 4.7.1-16 in Section 4.7.1.2 of the Draft EIR, the change in future (2028) aircraft noise conditions compared to existing baseline conditions is attributable to growth in passenger activity and aircraft operations that is anticipated to occur at LAX by 2028 with or without the proposed Project. In other words, the proposed Project itself would have no effect on noise levels associated with aircraft operations; rather, the change in noise levels from 2018 to 2028 aircraft operations will be entirely attributable to growth in aviation activity that will occur with or without the proposed Project. Please see Topical Response TR-ATMP-G-1 regarding the aviation demand forecast and future aviation activity at LAX.

Please also see Topical Response TR-ATMP-N-1 regarding health effects of noise and Topical Response TR-ATMP-N-2 regarding adequacy of the aircraft noise analysis and use of alternative metrics, such as single event metrics.

ATMP-AL010-75

Comment: The DEIR also gives an incomplete picture of the aircraft noise impacts that would result during construction, while the airport's existing runways are relocated or reconstructed as part of the Project.

Response: Please see Response to Comment ATMP-AL005-6 regarding the evaluation of temporary changes in aircraft noise due to runway closures during construction included in Section 4.7.1 of the Draft EIR.

ATMP-AL010-76

Comment: 2. The DEIR Errs By Not Analyzing the Project's Noise Impacts Through 2045.

The DEIR asserts there would be no long-term operational noise impacts in El Segundo associated with the Project. As explained earlier, however, the DEIR concludes that the Project's noise impacts are significant and unavoidable based on 2028 operations whether or not the Project is approved. The DEIR must instead disclose the Project's noise impact through 2045. This analysis must take into account individual and cumulative single-event noise impacts. Failing to do this violates CEQA.

Aviation forecasts and associated project/plan impacts are regularly evaluated in a way that looks out 20 years or more. Acoustical engineer Fred Svinth registers "surpris[e] that

the future analysis study year [2028] is only 10 years from the baseline year, whereas many large projects include study years which are 20 years in the future so as to avoid a future year too close to the current year once the project is implemented." Svinth Report at p. 3. The Svinth Report points to the Noise Assessment for the Norman Y. Mineta San Jose International Airport Master Plan EIR (2019),[40] which used a 20-year timeframe to analyze the future noise environment due to forecasted aircraft operational levels. 2019 SJC Airport Master Plan Amendment EIR, Appendix J - Noise at p. 18.[41] The Svinth Report also notes its author's frequent involvement with other major infrastructure projects that have analyzed noise impacts 20 or more years into the future, including at the Port of Los Angeles. Svinth Report at p. 3.

LAWA has provided detailed forecasts of anticipated passenger and aircraft operations until 2045, 17 years beyond the aspirational buildout year and 26 years beyond the DEIR's baseline year (2018). DEIR, Appendices B.1 and B.2. Because LAWA has this forecast data, there is no justification for concluding that noise impacts in 2028 would be significant and unavoidable based on forecasted future operations through 2045, while failing to make significance conclusions for impacts beyond 2028. As the Svinth Report states, "Considering that planning projections have been completed to [2045], it seems reasonable to also analyze aircraft noise in the surrounding communities to 2045 or at least to 20 years beyond the project baseline year (2038)." Svinth Report at p. 3. See also Kanafani Report at p. 2 ("The DEIR fails to assess the effect of the improvements on traffic growth and on the resulting environmental impact of this growth."). In sum, carrying the noise analysis out at least 20 years is necessary to provide a complete disclosure of noise impacts and is mandatory under CEQA. See *Cleveland National Forest Foundation*, 3 Cal.5th at 518. Despite possessing the background data needed to evaluate these noise impacts, LAWA fails to do so.

[40] Available at https://www.sanjoseca.gov/your-government/department-directory/planning-building-code-enforcement/planning-division/environmental-planning/environmental-review/active-eirs/sjc-airport-master-plan-update; last accessed on Feb. 9, 2021.
[41] Available at https://www.sanjoseca.gov/Home/ShowDocument?id=61662; last accessed Feb. 9, 2021.

Response: Please see Topical Response TR-ATMP-G-3 regarding the reasons why 2028 is the appropriate horizon year for evaluating the impacts of the proposed Project. In addition, Topical Response TR-ATMP-G-3 includes, for informational purposes, a general analysis of impacts beyond 2028. Please also see Response to Comment ATMP-AL010-215, which addresses the commenter's claim that the San Jose International Airport Master Plan impacts analysis is based on a 20-year planning horizon, as well as the other EIRs cited by the commenter. As explained there, the 20-year horizon year evaluated for those projects is not based on "planning projections" as asserted by the commenter, but rather reflects the completion timeframe for each project.

Regarding the Draft EIR's aviation forecast analysis, please see Section 2.3.1.2.2 and Appendix B.1 of the Draft EIR, as well as Topical Response TR-ATMP-G-1 for further discussion of the validity of this forecast.

ATMP-AL010-77

Comment: 3. The DEIR Substantially Understates the Noise Impact of the Project Because It Evaluates Project Impacts Against an Inappropriate Baseline.

CEQA requires lead agencies to "employ a realistic baseline that will give the public and decision makers the most accurate picture practically possible of the project's likely impacts." *Neighbors for Smart Rail*, 57 Cal.4th at 449. Moreover, the baseline may not be "misleading or without informational value." Id. at 457. The DEIR uses a 2018 baseline for the noise analysis and declines even to consider whether employing this baseline despite a nearly 75% decline in operations since 2019 would mislead or "give the public and decision makers the most accurate picture practically possible." Id. at 449. Unsupported statements in the Preamble to the DEIR, which cites anecdotally to previous recoveries from other "disruptive events" are not substantial evidence supporting LAWA's use of a 2018 baseline.

Contrary to LAWA's claims, any assumption that operations will have returned to "business as usual" once the Project is completed, rather than emerged permanently altered after the present transitional period, is pure speculation. See Kanafani Report at p. 1 (stating that current changes "in work habits, commerce and social activities may become long lasting if not permanent."). If, for example, in a post-recovery aviation industry, more passenger boarding gates enable increased public health vigilance at terminals, then the growth and associated noise impact of adding up to 29 new passenger gates as part of this Project must be analyzed against a noise baseline of passenger/operational capacity without the public-health benefit of 29 additional gates. LAWA's approach of assuming, without evidence, a return to 2019 conditions once the Project is completed would conceal this highly plausible effect of the Project on existing noise impacts.

Response: The essence of the comment, that a revised CEQA baseline should have been used in light of the COVID-19 pandemic, is similar to the assertion made in comment ATMP-AL010-11. Please see Response to Comment ATMP-AL010-11 and Topical Response TR-ATMP-G-1. For the reasons explained therein, the Draft EIR's noise analysis is accurate and appropriate. Additionally, the idea that the COVID-19 pandemic would result in more passenger gates to enable increased public health at terminals is purely speculative; the commenter provides no evidence to support this idea, and there is none.

ATMP-AL010-78

Comment: Moreover, for the reasons explained in Part II, the "Without Project" scenario, purportedly provided for the "informational" purpose of claiming that operational noise impacts would be effectively the same in 2028, is likewise erroneous and causes the DEIR to understate the Project's true noise impacts. LAWA must revise the "Without Project" scenario to omit the MSC South Project and the 18 WRGs, and reevaluate whether environmental impacts are actually different under each scenario.

Response: Please see Topical Response TR-ATMP-G-2 regarding the assertion that LAWA should exclude the eight gates associated with Phase 2 of the Midfield Satellite Concourse (MSC) Program and the 18 West Remote Gates from the Without Project scenario with respect to the analysis of noise. As explained in the topical response, the Draft EIR's assumptions for the No Project and Without Project scenarios are reasonable and based on substantial evidence.

ATMP-AL010-79

Comment: 4. By Relying on CNEL to Evaluate Noise Impacts, the DEIR Fails to Adequately Analyze the Full Extent of the Project's Noise Impacts.

CEQA requires an EIR to "identify and focus on the significant environmental effects of the proposed project." CEQA Guidelines § 15126.2(a). An EIR must contain "a sufficient degree of analysis to provide decisionmakers with information which enables them to make a decision which intelligently takes account of environmental consequences." Id. § 15151. While an EIR need not be perfect, courts have insisted upon "adequacy, completeness, and a good faith effort at full disclosure." Id. The level of detail required in addressing particular impacts should be "in proportion to their severity and probability of occurrence." Id. § 15143.

The DEIR severely understates the Project's noise impacts by relying on a noise level indicator that evaluates average noise levels. This noise indicator, referred to as Community Noise Equivalent Level or "CNEL," averages noise events over a 24-hour period. Although CNEL provides one way to measure noise, when it is used as the only measure of noise, CNEL does not provide a true or complete picture of what individuals will actually hear as a result of the Project. People hear individual noise events; they do not hear noise averaged over a twenty four–hour period. All aspects of single-event noise impacts from the Project must therefore be analyzed here. This includes Sound Exposure Level ("SEL") analysis noise impacts caused by Project-related changes to aircraft taxiing (routes, frequency/number, fleet mix), Project-related changes to aircraft flight operations (frequency/number, fleet mix), and Project-related changes to aircraft maintenance operations (frequency/number, fleet mix, location).[42]

The FAA has established a CNEL of less than 65 dBA as being "normally acceptable" with residential land uses, despite research and public testimony that a CNEL threshold of 65 dBA is not sufficient to protect the public's health and welfare. See, e.g., Jiao, Boshen et al. "The Cost-Effectiveness of Lowering Permissible Noise Levels Around U.S. Airports." International Journal of Environmental Research and Public Health, vol. 14, December 2, 2017.[43] However, "[i]ntermittent and impulsive noises, such as aircraft overflights, have been found to be more disturbing to sleep than continuous noise sources." Svinth Report at p. 2. Thus, people exposed to a CNEL of lower than 65 dBA may be significantly disturbed by aircraft noise, sometimes for many hours a day. Further, relative changes in single-event noise levels have been found to be predictive of sleep disturbance in residents of neighboring airports. Id. (citing Fidell S., Tabachnick B., Mestre V., and Fidell L. "Aircraft noise-induced awakenings are more reasonably predicted from relative than

from absolute sound exposure levels," The Journal of the Acoustical Society of America 134, 3645 (2013)). Yet, these people, particularly those who would be newly exposed to aircraft noise due to future Project-related operations or temporary construction-related aircraft noise increases, are ignored in the DEIR's analysis of aircraft noise because noise levels in their communities (at least according to the DEIR) fall below a CNEL of 65 dBA. Svinth Report at p. 2.

[42] Moreover, as the Svinth Report explains, the CNEL analysis in the DEIR assumes a typical outdoor ambient noise level of 85 dBA CNEL for development adjacent to major freeways. This ambient level is overstated. Svinth Report at p. 1. In the author's expert experience, ambient noise levels of 75-80 dBA are typical for the first row of development outside a freeway right-of-way. Id. (citing references). Overstating typical levels may result in noisy Project operations being interpreted as "background" noise, thereby understating the relative impact of Project noise on surrounding uses.
[43] Available at https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5750915/; last accessed Mar. 9, 2021.

Response: The comment assumes that there will be a significant increase in aircraft operations that will result from the proposed Project. Implementation of the proposed Project would not result in more aircraft operations at LAX than would otherwise occur without the Project. With regard to future aircraft noise levels at LAX, as discussed on page 4.7.1-16 in Section 4.7.1.2 of the Draft EIR, the change in future (2028) aircraft noise conditions compared to existing baseline conditions is attributable to growth in passenger activity and aircraft operations that is anticipated to occur at LAX by 2028 with or without the proposed Project. In other words, the proposed Project itself would have no effect on noise levels associated with aircraft operations; rather, the change in noise levels from 2018 to 2028 aircraft operations will be entirely attributable to growth in aviation activity that will occur with or without the proposed Project. Please see Topical Response TR-ATMP-G-1 regarding the aviation demand forecast and future aviation activity at LAX.

Please see Response to Comment ATMP-AL010-211 regarding outdoor ambient noise levels for development adjacent to major freeways.

Please see Topical Response TR-ATMP-N-1 regarding health effects of noise and Topical Response TR-ATMP-N-2 regarding adequacy of the aircraft noise analysis and use of alternative metrics, such as single event metrics.

ATMP-AL010-80

Comment: The DEIR pays lip service to assessing the health effects of aircraft noise. The document contains perfunctory sections on speech communication, sleep disturbance, learning effects, and work performance effects. But rather than attempt to undertake a serious analysis of these physiological and psychological health effects resulting from the proposed Project, it merely states that there is little reliable evidence on the relationship between noise exposure and mental health. See Svinth Report at p. 1. Contrary to the assertion in the DEIR, ample studies and reports exist documenting the health impact of

aircraft noise. Svinth Report at fn. 3; see also Basner, Mathias et al., "Aviation Noise Impacts: State of the Science." Noise & Health vol. 19, Mar.-Apr. 2017.[44] LAWA must analyze and disclose the impacts that individuals living beneath the LAX flight paths will endure once the Project is implemented. Such an analysis must focus on the SEL noise levels, which are unrelenting and extraordinarily disruptive.

In *Berkeley Keep Jets Over the Bay Committee v. Board of Port Commissioners*, the court held that a lead agency "cannot simply ignore the CEQA standard of significance for assessing noise [and] the credible expert opinion calling for further evaluation of the impact of single event noise." (2001) 91 Cal.App.4th 1344, 1382. Despite this, the DEIR impermissibly disregards the sensitivity of the community most affected by the Project's noise impacts. See *Berkeley Keep Jets Over the Bay Com.*, 91 Cal.App.4th at 1380-81 (recognizing "significance of an activity may vary with the setting" as basis for CEQA's site-sensitive threshold of senescence for noise); *King & Gardiner Farms, LLC v. Cty. of Kern* (2020)[45] Cal.App.5th 814, 894, as modified on denial of reh'g (Mar. 20, 2020) (holding that the agency failed to consider the magnitude of the increase in noise, and thus to "accurately describe[] how changes in noise levels affect human beings."). A description of how noise affects a community without meaningful quantitative and qualitative analysis of "the community reaction to aircraft noise, including sleep disturbance" renders an EIR inadequate. *Berkeley Keep Jets Over the Bay Com.*, 91 Cal.App.4th at 1380-81. The court in *Berkeley Keep Jets Over the Bay Committee* expressly referred to single-event noise analysis as an appropriate method for measuring disturbance. Id. Thus, the DEIR must be revised to adequately measure sleep and speech communication disturbances and to disclose the full impact, including health impacts, of single-event disturbances.[45]

[44] Available at https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5437751/; last accessed Mar. 9, 2021.

[45] The Svinth Report notes that "the modeling software used in the noise analysis . . . has the ability to create a grid analysis graphic of changes in event based (Lmax) aircraft noise levels at residential and other noise sensitive uses in the airport vicinity. The inclusion of such a graphic and event-based noise data in combination with information provided on awakenings, sleep disturbance, and physiological effect of aircraft noise would allow the surrounding communities to be more fully informed as to the potential effects and impacts of aircraft noise." Svinth Report at p. 3. Based on the availability of this feature with the software the DEIR already relies on, the revised EIR should include this information.

Response: Please see Topical Response TR-ATMP-N-1 regarding health effects of noise.

ATMP-AL010-81

Comment: 5. The DEIR's Omission of Single-Event Noise Impact Findings Is Anomalous Among EIRs for Comparable Airport Expansion Projects.

We and El Segundo's expert noise consultant have surveyed CEQA documents prepared for recent development proposals at other California airports. While we cannot say that those documents were fully compliant with CEQA, we did find that several were much more transparent and complete than the ATMP DEIR in a number of critical ways. Our survey of recent airport EIRs shows that single-event noise analysis is now the industry standard.

For example, the Noise Analysis for the 2016 Burbank Airport Replacement Passenger Terminal Project EIR contains SEL contours and SEL data tables to compare the SEL values for the noisiest passenger aircraft at the airport at selected noise-sensitive receptors. See 2016 Burbank Project EIR, Appendix K – Noise Technical Report at Table K-3 and Figures K-5 through K-12.[46] The document notes that aircraft SEL data is valuable for "demonstrat[ing] the spatial extent of noise events" resulting from, for example, aircraft taxiing operations for various project alternatives. See id. at p. K-9. Notably, the Burbank Airport project involved a 1-to-1 replacement of gates and would add no additional gates, unlike the Project, which would add up to 29 new gates.

2016 Burbank Project EIR, Appendix K – Noise Technical Report, Table K-3:

Table K-3
737-800 Aircraft Taxi Noise (SEL) at Nearby Noise Sensitive Uses[1]

Site ID and Taxi Path	Existing		Adjacent Property Full-Size Terminal Option		Southwest Quadrant Full-Size Terminal Option		Southwest Quadrant Same-Size Terminal Option	
	Arrival	Depart	Arrival	Depart	Arrival	Depart	Arrival	Depart
Site 1								
Runway 8	62.6	-	64.6	-	67	-	67	-
Runway 33	83.8	66.5	82.9	65.4	82.3	86.9	82.3	86.9
Runway 26	-	65.6	-	65.6	-	62.5	-	62.5
Runway 15	58.3	82.9	63.4	82.9	86.9	82.5	86.9	82.5
Site 2								
Runway 8	65.8	-	70.6	-	73	-	73	-
Runway 33	80.7	72.1	80.4	71.8	81.1	82.2	81.1	82.2
Runway 26	-	71.5	-	71.5	-	66.7	-	66.7
Runway 15	63.1	80.4	70.4	80.4	82.2	81.5	82.2	81.5
Site 3								
Runway 8	66	-	70.9	-	83.7	-	83.7	-
Runway 33	74.2	71.4	71.3	73.9	75.8	70.8	75.8	70.8
Runway 26	-	70.3	-	70.3	-	71	-	71
Runway 15	66.9	71.3	70.7	71.3	70.8	84.2	70.8	84.2
Site 4								
Runway 8	70.5	-	72.8	-	87.3	-	87.3	-
Runway 33	72.1	73.7	65.2	80.1	81.1	61	81.1	61
Runway 26	-	71	-	71	-	81.7	-	81.7
Runway 15	76.2	65.2	73.8	65.2	61	87.3	61	87.3

Source: RS&H, 2016

2016 Burbank Project EIR, Appendix K – Noise Technical Report, Fig. K-9:

[See original comment letter for figure.]

Similarly, the Noise Assessment for the Norman Y. Mineta San Jose International Airport Master Plan EIR (2019) presents Time Above ("TA") values for aircraft noise levels greater than 75 dB and 85 dB at various receiver points, along with the overall land area exposed to the SEL values for the departure and arrival of various aircraft types, and SEL

results for the predominant aircraft in the fleet mix. 2019 SJC Airport Master Plan Amendment EIR, Appendix J - Noise at Table 12, Table 13 and Table 14. The EIR also notes that an earlier (2003) EIR contained a similar analysis comparing existing and future SEL conditions and identified increases in SEL values in the airport vicinity. Id. at p. 25.

2019 SJC Airport Master Plan Amendment EIR, Appendix J – Noise, Table 12:

Table 12 – Time Above (TA) 75 dBA and 85 dBA for All Scenarios (in minutes)

Reference Grid Points	Location Street	Location City	Time Above 75dB in Minutes Baseline	Project	No Project	Time Above 85dB in Minutes Baseline	Project	No Project
1	RMS 10 - Residential	Santa Clara, CA	12.0	14.4	14.5	0.1	0.1	0.1
2	Public Utility (adjacent residential	Santa Clara, CA	3.5	4.6	4.6	0.0	0.0	0.0
3	Agnew Park - SW cr. Agnew Rd. / Cheeney St.	Santa Clara, CA	8.7	11.7	11.8	0.1	0.1	0.1
4	Convalescent Hospital - N. Side Clyde Ave. @ Loch Lomond St.	Santa Clara, CA	13.3	14.6	14.6	0.1	0.1	0.1
5	Center for Performing Arts	San Jose, CA	22.4	30.5	30.5	0.0	0.0	0.0
6	Montague Park/School	Santa Clara, CA	14.8	17.6	17.6	0.0	0.0	0.0
7	Chestnut St.	Santa Clara, CA	1.3	1.8	1.8	0.0	0.0	0.0
8	Fairway Glen Park/Hughes School	Santa Clara, CA	0.4	0.4	0.4	0.0	0.0	0.0
9	Washington School	San Jose, CA	14.1	18.7	18.7	0.0	0.0	0.0
10	Bellarmine Prep School	San Jose, CA	0.2	0.3	0.3	0.0	0.0	0.0
11	Residential	San Jose, CA	23.8	21.6	21.5	0.1	0.5	0.5
12	Alviso Community Center - SE cr. San Jose Alviso Rd./Liberty St.	San Jose, CA	0.2	0.1	0.1	0.0	0.0	0.0
13	Cottage Trailer Grove - SW cr. Monterey Hwy./San Jose Ave.	San Jose, CA	2.7	3.0	3.0	0.0	0.0	0.0
14	Agnews State Hospital - SW cr. Lick Mill Rd./Lick Mill Blvd.	Santa Clara, CA	0.1	0.1	0.1	0.0	0.0	0.0
15	Bachrodt School - SE cr. Sonora Ave./Forrestal Ave.	San Jose, CA	0.7	0.8	0.8	0.0	0.0	0.0
16	Hester School - SE cr. Alameda/Pershing Ave.	San Jose, CA	0.1	0.0	0.0	0.0	0.0	0.0
17	Ryland Park - SW cr. N. First St./Fox Ave	San Jose, CA	0.8	0.8	0.8	0.0	0.0	0.0
18	Lamplighter Trailer Park - Swvsd Hwy 237 and N. First St.	San Jose, CA	0.1	0.0	0.0	0.0	0.0	0.0

Source: AEDT version 2d and BridgeNet International, 2019

2019 SJC Airport Master Plan Amendment EIR, Appendix J – Noise, Table 13:

Table 13 – Sound Exposure Level in Acres

Arrivals	SEL dBA Area in Acres							
AEDT Type	55	60	65	70	75	80	85	90
A319-131	73,526	49,723	30,018	14,404	5,311	2,357	718	204
A320-211	87,915	60,293	38,675	19,987	7,429	2,875	913	269
737700	73,780	51,305	31,580	16,669	8,094	3,499	1,362	415
737800	93,976	64,126	39,599	21,138	9,252	4,695	1,473	406
7378MAX	174,321	118,790	78,087	45,420	22,402	4,475	1,282	354
EMB175	55,634	37,137	21,031	10,332	4,699	2,175	802	203
CL600	23,021	11,590	5,576	2,768	1,285	509	156	41
CNA750	44,486	26,813	13,045	6,147	2,583	962	318	111

Departures	SEL dBA Area in Acres							
AEDT Type	55	60	65	70	75	80	85	90
A319-131	99,036	66,711	43,014	24,653	10,913	4,190	1,733	752
A320-211	123,021	82,972	53,975	31,719	13,919	5,639	2,224	1,057
737700	137,667	93,838	63,336	40,538	22,209	8,238	2,890	982
737800	165,198	111,320	74,816	47,957	26,648	9,989	3,650	1,605
7378MAX	121,346	75,489	44,387	19,464	7,889	2,969	1,245	421
EMB175	119,372	80,689	52,755	31,165	13,780	5,461	1,942	705
CL600	74,648	49,482	29,943	13,404	5,548	2,301	1,061	373
CNA750	55,461	28,770	12,386	5,471	2,264	890	355	140

Source: AEDT version 2d and BridgeNet International, 2019

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2019 SJC Airport Master Plan Amendment EIR, Appendix J – Noise, Table 14:

Table 14 – Single Event Aircraft Sound Levels for All Scenarios (SEL in dB)

Reference Grid Points	Location Street	Location City	Airbus A319	Boeing B737	Boeing B38M	Embraer E175
1	RMS 10 - Residential	Santa Clara, CA	88.5	89.1	86.7	87.4
2	Public Utility (adjacent residential	Santa Clara, CA	83.6	86.7	82.7	84.9
3	Agnew Park - SW cr. Agnew Rd. / Cheeney St.	Santa Clara, CA	87.5	88.5	86.1	86.8
4	Convalescent Hospital - N. Side Clyde Ave. @ Loch Lomond St.	Santa Clara, CA	88.5	87.6	86.5	87.7
5	Center for Performing Arts	San Jose, CA	89.0	91.3	90.7	88.7
6	Montague Park/School	Santa Clara, CA	87.8	86.8	85.5	87.1
7	Chestnut St.	Santa Clara, CA	82.2	84.2	80.6	83.6
8	Fairway Glen Park/Hughes School	Santa Clara, CA	80.5	83.8	79.1	82.8
9	Washington School	San Jose, CA	87.1	89.5	88.7	87.0
10	Bellarmine Prep School	San Jose, CA	69.1	72.6	71.7	70.0
11	Residential	San Jose, CA	75.3	80.2	74.6	78.9
12	Alviso Community Center - SE cr. San Jose Alviso Rd./Liberty St.	San Jose, CA	72.9	77.3	71.2	75.8
13	Cottage Trailer Grove - SW cr. Monterey Hwy./San Jose Ave.	San Jose, CA	84.9	87.2	86.7	85.1
14	Agnews State Hospital - SW cr. Lick Mill Rd./Lick Mill Blvd.	Santa Clara, CA	78.5	81.5	76.7	80.5
15	Bachrodt School - SE cr. Sonora Ave./Forrestal Ave.	San Jose, CA	77.1	80.1	76.3	80.4
16	Hester School - SE cr. Alameda/Pershing Ave.	San Jose, CA	68.2	71.8	70.9	69.2
17	Ryland Park - SW cr. N. First St./Fox Ave.	San Jose, CA	72.3	75.7	74.9	73.1
18	Lamplighter Trailer Park - Swvof Hwy 237 and N. First St.	San Jose, CA	73.0	78.1	71.2	76.4

Source: AEDT version 2d and BridgeNet International, 2019

Single event analysis of noise is feasible and does not require speculation. El Segundo's expert noise consultant opines that the DEIR's aircraft noise analysis "should at least provide event-based noise data such as maximum noise levels, single event levels, and/or time above information for existing and future aircraft operations at residential and other noise sensitive uses in the airport vicinity." Svinth Report at p. 3. LAWA has deviated from the norm here by not providing this analysis.

[46] Available at https://elevatebur.com/documents/; last accessed on Feb. 9, 2021.

Response: Please see Topical Response TR-ATMP-N-1 regarding health effects of noise and Topical Response TR-ATMP-N-2 regarding adequacy of the aircraft noise analysis and use of alternative metrics, including a review of CEQA airport documents published over the last 10 years.

ATMP-AL010-82

Comment: 6. The DEIR Inadequately Discloses, and Fails to Mitigate, Noise Impacts on El Segundo Residents Due to Airfield Construction.

The DEIR attributes one narrow noise impact to the Project, namely, a significant and unavoidable increase in runway operations noise exceeding 65 dBA CNEL, and/or an increase in noise or exceeding 1.5 dBA CNEL in areas already exposed to 65 dBA CNEL or higher. DEIR at p. 4.7.1-40. The increase would be due to a temporary (estimated at 4.5-month) shift of runway operations from the north airfield to the south airfield, while the north airfield taxiway/runway exit improvements are being implemented. The DEIR states that the temporary impact would occur toward the southwest corner of the airport, and affect residents in the northwest corner of El Segundo.

However, the DEIR fails to provide enough information to make this disclosure meaningful, or sufficient, under CEQA. First, the DEIR does not even attempt to identify which areas, including which residences, would be affected by the temporary increase in noise. Svinth Report at p. 4 ("DEIR discusses the effect of the temporary runway closures on residential areas [but] does not specifically define these areas"). The

question of which residences or other land uses would be impacted by this aspect of the Project depends on the anticipated noise baseline in 2023 and 2024, when the runway shift would occur; other than stating that this temporary impact is measured against the 2023/2024 baseline, however, the DEIR does not actually state what this baseline is (e.g., does not provide a noise contour). See DEIR at p. 4.7.1-31. Nor does the DEIR state what facilities or operational assumption existing in 2023/2024 would be factored into this baseline. Id. The affected area/residences, number of noise-sensitive uses exposed, the level of noise impact at these uses and the 2023/2024 baseline used to make these determinations must be disclosed in the revised EIR.

Response: Please see Response to Comment ATMP-AL005-6 regarding the evaluation of temporary changes in aircraft noise due to runway closures during construction included in Section 4.7.1 of the Draft EIR. Please see Response to Comment ATMP-AL010-84 regarding mitigation measures for interim aircraft noise impacts that would occur during temporary runway closures and runway exit construction.

The Draft EIR addresses the impacts of temporary changes in aircraft noise, due to reassignment of aircraft operations to other runways at LAX during temporary closure of Runway 6L-24R (in early 2023) and Runway 6R-24L (in early 2024) in Section 4.7.1.5.1.1. Short-term closures of each of the north airfield runways during construction would require aircraft to use three runways at LAX instead of four, resulting in more aircraft using each of the remaining runways. This would not result in more aircraft operations overall. This would cause a temporary, significant aircraft noise impact during each runway closure. Each closure is expected to last approximately 4.5 months in duration. Section 4.7.1.4 describes the methodology for analysis of noise impacts during temporary runway closures.

For the purpose of analyzing noise impacts during these temporary runway closures, the baseline conditions used were those that would occur during each affected year, but without the closure (i.e., aircraft noise levels occurring in 2023 with the temporary closure of Runway 6L-24R were compared to noise levels projected to occur in 2023 without the runway closure; the same approach was used for 2024 relative to the temporary closure of Runway 6R 24L). By comparing impacts to 2023 and 2024 conditions, instead of 2018, the analysis accurately identifies temporary short-term noise impacts that would occur as a direct consequence of temporary runway closures during project construction. It would be misleading and of no informational value to use the 2018 baseline conditions for this analysis, as the difference in noise levels would be partially attributable to five to six years of growth in aircraft operations projected to occur at LAX rather than solely to the temporary runway closures.

ATMP-AL010-83

Comment: Second, as stated earlier, the full disclosure of impacts from the temporary shift in runway operations to the south airfield must include single-event noise data. Id. (data should be presented as "existing and future maximum noise levels, single event levels, and/or time above information for aircraft operations at residential and other noise

sensitive uses in the airport vicinity"). See *Berkeley Keep Jets Over the Bay Com.,* 91 Cal.App.4th at 1382; *King & Gardiner Farms, LLC*, 45 Cal.App.5th at 894.

Response: Contrary to the commenter's assertion, there is not a requirement that disclosure of impacts from the temporary shift in runway operations must include single-event noise data. The case law cited by the commenter did not require the use of the noise metrics stated in the comment (i.e., existing and future maximum noise levels, single event levels, and/or time above information for aircraft operations), but rather required a reasoned explanation and substantial evidence supporting the use of an "average" cumulative day-night noise level (i.e., "DNL" which is analogous to CNEL – see additional discussion below). Such an explanation and substantial evidence in support of the analysis of noise impacts from the temporary shift in runway operations to the south airfield in terms of CNEL are provided within the LAX Aircraft and Terminal Modernization Project Draft EIR. Section 4.7.1.1.2 of the Draft EIR provides a comprehensive discussion of the various metrics used to measure and described noise, including A-weighted sound pressure level (dBA), maximum noise level (Lmax), single event noise exposure level (SENEL) and sound exposure level (SEL), equivalent continuous noise level (Leq), day-night average sound level (DNL), Community Noise Equivalent Level (CNEL), and time above (TA). As indicated therein, DNL is widely accepted as the best available method to describe aircraft noise exposure and is the noise descriptor required for aircraft noise exposure analyses and land use compatibility planning under Federal Aviation Regulation Part 150 and for environmental assessments for airport improvement projects (FAA Order 1050.1F), and the FAA accepts the use of CNEL as a substitute for DNL. As also discussed therein, CNEL is similar to DNL in that both metrics apply a noise "penalty" to noise events occurring during the more noise-sensitive times of the day, such as at night when sleeping typically occurs. Section 4.7.1.1.3 of the Draft EIR described the effects of noise on humans, including as related to hearing loss, communication interference, sleep disturbance, and physiological responses. Additional discussion of alternative noise metrics, including as related to single event noise metrics and the issue of sleep disturbance raised in *Berkeley Keep Jets Over the Bay* is provided in TR-ATMP-N-2. The Draft EIR's disclosure of impacts from the temporary shift in runway operations to the south airfield in terms of CNEL, which being analogous to DNL is widely accepted as the best available method to describe aircraft noise exposure and is the noise descriptor required for aircraft noise exposure analyses and land use compatibility planning, is reasonable and appropriate, and is supported by substantial evidence presented in the Draft EIR. Given that the temporary runway closures would occur over the course of the 24-hour day period of each and every day during the 4.5-month closure period and the reassignment of aircraft to other runways would also occur in that manner, as opposed to closing a runway and reassigning aircraft to other runways for only certain hours of the day, the use of CNEL is an appropriate metric for disclosing impacts to noise-sensitive uses in that it accounts for changes in aircraft noise characteristics throughout the entire day and includes penalties for aircraft operations that occur during noise-sensitive hours. Such a complete characterization of noise impacts throughout the course of the day, with inclusion of noise penalties during the more noise-sensitive hours, is not possible in using a more isolated, limited noise metric such as maximum noise levels, single event levels, and/or time above, as suggested by the commenter.

ATMP-AL010-84

Comment: Third, the DEIR does not even attempt to mitigate this temporary-but-significant impact, instead asserting that relief from a temporary increase in runway aircraft noise would not be feasible. This conclusion is not supported by substantial evidence; for instance, temporary treatments such as noise barrier blankets, or relocating some or all affected residents for the duration of construction, may both be feasible mitigation measures. Yet the DEIR fails even to consider either of these options, or any others. Because the DEIR fails to quantify the actual noise exposure during the runway closure period (and thus the amount of noise that would have to be mitigated in order to reduce the impact to less-than-significant), or the number/location of noise sensitive uses that would be impacted, the DEIR's determination of infeasibility is without basis.

Response: Section 4.7.1.5.1.3 of the Draft EIR addresses the feasibility of mitigation measures for interim aircraft noise impacts that would occur during temporary runway closures and runway exit construction. As that section states, it is likely that some of the noise-sensitive uses that would experience a temporary increase in aircraft noise levels during the short-term (4.5-month) closures of Runways 6R-24L and 6L-24R are already exposed to aircraft noise levels of 65 CNEL or greater and have been mitigated through sound insulation, are in the process of receiving sound insulation, or have declined to receive offered sound insulation. For noise-sensitive uses that would be newly exposed to 65 CNEL during the short-term runway closures and that have not previously received mitigation, it is not practical or feasible to implement sound attenuation improvements for a temporary (e.g., 4.5 month) period. Federal regulations (49 U.S.C. § 47107) restrict use of airport revenues to capital or operating cost of the airport or airport system, and the FAA does not permit the use of airport revenue to implement sound insulation for interim noise impacts, or to insulate homes outside of the 65 DNL contour.

ATMP-AL010-85

Comment: 7. The DEIR Fails to Adequately Analyze or Mitigate Construction Staging/Hauling Noise Impacts.

The DEIR also fails to adequately analyze and mitigate construction noise impacts. First, the DEIR's identification of existing ambient conditions against which construction noise is measured are not based on substantial evidence.

Response: In response to the first part of the comment regarding haul routes, the content of this comment is similar to ATMP-AL010-72; please refer to Response to Comment ATMP-AL010-72.

The second part of the comment is a summary statement of the more detailed comments presented later as ATMP-AL010-90; please refer to Response to Comment ATMP-AL010-90.

ATMP-AL010-86

Comment: Second, because the analysis once again relies on CNEL data, it masks actual construction noise impacts, which would be more appropriately assessed using hourly noise levels or another metric.

Response: The content of this comment is similar to comment ATMP-AL010-88; please refer to the first paragraph of Response to Comment ATMP-AL010-88.

ATMP-AL010-87

Comment: As the Svinth Report notes, the ambient conditions used to evaluate construction noise only take into account aircraft noise, and omit other ambient noise sources such as roadway traffic, commercial activities and other land uses/activities which could contribute to ambient noise levels. Svinth Report at p. 5. Furthermore, noise measurement data should have been recorded at times of day corresponding with likely construction activities in order to establish existing ambient noise levels. Id.

Response: Aircraft noise in terms of CNEL was modeled in FAA's Aviation Environmental Design Tool (AEDT) and was used for ambient conditions because aircraft noise was found to dominate the noise environment in the analysis area. Long-term (24 hour) measurements were completed in the Fall of 2019. Data from the four sites are provided in the table and map below.

Site	Site Name	Measured CNEL (dBA)	AEDT CNEL (dBA)	Difference (dBA)
LT-01	Residence Inn	69.2	70.2	-1.0
LT-02	Sepulveda West Apartments	64.0	63.2	0.7
LT-03	Kittyhawk/Westchester	73.0	71.2	1.8
LT-04	Travelodge	71.9	65.0	6.9

Access to additional measurement locations throughout the entire Project area was not feasible due to access restrictions (i.e., lack of right of entry approvals) and hotel privacy policy issues. The measurement data that were collected served to substantiate the following assumptions that went into the analysis methodology:-

1. That aircraft noise dominates the acoustic environment in the analysis area; and,
2. That utilizing aircraft noise levels as the baseline ambient noise condition would not substantially overestimate ambient noise conditions (i.e., would not result in an artificially high ambient noise baseline that could cause construction noise impacts to be underestimated).

Specifically, in the comparison of measured and modeled CNEL for the existing operational conditions at LAX, as shown in the table above, at three of the four sites, measured CNELs are generally within 1 to 3 dB of the AEDT results, a level that would

not be perceptibly different, indicating that aircraft operations dominate the acoustic environment in the area.

At Site LT-04, measurements indicate a CNEL value that is 6.9 dBA greater than what was modeled in AEDT. Considering how closely the measured and AEDT results matched at the other three sites, this discrepancy indicated one of two possibilities:

1. The day that measurement data was taken was an outlier and ambient noise levels on that day were louder than what might occur over the course of a year. Therefore, utilizing measurement-derived CNEL might substantially overestimate ambient noise conditions and, therefore, skew the analysis toward underestimating construction noise impacts, or;
2. There are substantial sources of ambient noise in the analysis area near that site, such as roadway traffic or commercial activities, that are louder than aircraft noise, meaning the use of AEDT (modeled) CNEL levels provides a conservative estimate of ambient noise levels against which a lower significance threshold was calculated, meaning that construction noise impacts might be overestimated in the analysis.

At the risk of overestimating construction noise impacts, but in the interest of ensuring that no impacts were underestimated, CNELs modeled in AEDT were used to establish baseline ambient noise conditions in the Draft EIR. Additionally, this solved for the possibility that the day of measurements at site LT-04 was an outlier as AEDT uses an average annual day (AAD) to calculate noise levels.

As indicated in the construction noise analysis methodology description in Section 4.7.3.2.2 of the Draft EIR, construction of the proposed Project is likely to include limited periods when construction activities are scheduled to occur during the evening and nighttime hours. As such, the use of CNEL to characterize noise levels throughout the 24-hour period including day, evening, and night is appropriate. As also described in that section of the Draft EIR, the calculation of noise levels from construction equipment was also in terms of CNEL, which added noise penalties to construction equipment activity occurring during the more noise-sensitive evening and nighttime hours (i.e., 5 dB penalty for noise during the evening and 10 dB penalty for noise during the night).

Comparison of data to ambient conditions at each identified receptor during daytime, evening, nighttime and early morning hours is not a requirement under CEQA nor is it recommended in the L.A. CEQA Thresholds Guide.[1] Moreover, the construction noise analysis methodology description in Section 4.7.3.2.2 of the Draft EIR indicates that the majority of construction activity associated with the proposed Project, however, is likely to include limited periods when construction activities are scheduled to occur during the evening and nighttime hours. The construction impacts analysis for the proposed Project uses CNEL to characterize noise levels throughout the 24-hour period including day, evening, and night. As also described in that section of the Draft EIR, the calculation of noise levels from construction equipment was also expressed in terms of CNEL, which adds noise penalties to construction equipment activity occurring during the more noise-sensitive evening and nighttime hours (i.e., 5 dB penalty for noise during the evening and 10 dB penalty for noise during the night). Although construction during evening and nighttime hours may only occur on a limited basis, the use of CNEL provides for a

conservative impacts analysis that includes evening and nighttime noise, and the associated noise penalties, throughout the entirety of Project construction. As such, the use of CNEL data as the basis for characterizing existing ambient noise levels is appropriate and accounts for noise during any time of the day.

[1] City of Los Angeles, L.A. CEQA Thresholds Guide, Your Resource for Preparing CEQA Analyses in Los Angeles, 2006. Available: https://planning.lacity.org/odocument/cc8fb2f5-dc6c-47f1-bfc3-864b84621abb/CEQAThresholdsGuide.pdf.

ATMP-AL010-88

Comment: Moreover, as the Svinth Report explains, whereas most projects evaluate construction noise using peak hourly average (Leq) or maximum (Lmax) noise levels, here the DEIR reports construction impacts using a daily CNEL level by hour. Yet LAWA appears to have done—and opted not to disclose—the hourly Leq levels for each construction phase. Svinth Report at p. 6. The DEIR must disclose the analysis of construction noise impacts in a more meaningful metric, such as peak hourly average or maximum noise levels, and compare this data to the properly measured ambient conditions at each identified sensitive receptor during daytime, evening, nighttime and early morning hours. Id.

Response: As stated on page 4.7.3-3 of the Draft EIR, the Federal Highway Administration's (FHWA) Roadway Construction Noise Model (RCNM) was used to calculate construction equipment noise levels.[1] These methodologies predict an hourly Leq for each hour of an anticipated 24-hour cycle for a given phase and location of construction. Hourly Leq predictions were then used to calculate a CNEL level for the purposes of assessing impact conditions. As discussed in Section 2.1 of Appendix F.3, this is consistent with the L.A. CEQA Thresholds Guide, which states, "To account for the fluctuation in noise levels over time, noise impacts are commonly evaluated using time-averaged noise levels. The Community Noise Equivalent Level (CNEL) represents an energy average of the A-weighted noise levels over a 24-hour period with 5 dBA and 10 dBA increases added for nighttime noise between the hours of 7:00 p.m. and 10:00 p.m. and 10:00 p.m. to 7:00 a.m., respectively. The increases were selected to account for reduced ambient noise levels during these time periods and increased human sensitivity to noise during the quieter periods of the day."[2]

Regarding metrics used to evaluate construction noise, construction noise assessment methodologies and determination of significance of impact may differ among CEQA projects due to the presence or absence of local guidance. In the absence of local guidance, lead agencies may derive significance thresholds from Appendix G of the State CEQA Guidelines and may, therefore, utilize different metrics in their determination of significance of impact. However, within the City of Los Angeles, the L.A. CEQA Thresholds Guide provides relevant guidance for CEQA studies conducted for proposed projects within the City of Los Angeles. This guidance directs agencies to utilize significance thresholds based on the CNEL metric on page I.1.-4.[3] As a result, the methodology utilized in this Draft EIR is consistent with guidance applicable in the City of Los Angeles,

as well as prior EIRs conducted at LAX that assessed construction noise impacts, including the 2013 LAX Specific Plan Amendment Study EIR[4] and the 2017 LAX Landside Access Modernization Program EIR.[5] Other agencies follow guidance applicable in their jurisdictions, and that guidance may or may not be consistent with the L.A. CEQA Thresholds Guide. Indeed, some other California cities and counties exempt construction noise that occurs during certain hours (e.g., on weekdays), and construction noise occurring during these periods is considered to be temporary and therefore not a significant environmental impact. In this respect, guidance applicable in the City of Los Angeles is more stringent than it is in other cities and counties. Please also see Response to Comment ATMP-AL010-87 above for additional discussion regarding the use of CNEL in evaluating construction equipment noise impacts associated with the proposed Project.

Regarding disclosure of construction noise impacts in a different metric, the Draft EIR discloses hourly average sound levels (Leq) for each phase of construction in Attachment A to Appendix F.3 of the Draft EIR, and also includes the weighted-hourly average sound level (Leq + penalty) that is used to calculate CNEL for purposes of determination of significance of impact, consistent with the L.A. CEQA Thresholds Guide,[6] and also to provide a conservative (i.e., worst-case) analysis, as described in Response to Comment ATMP-AL010-87 above. In light of the commenter's concern, based on the aforementioned hourly average sound levels (Leq) for each phase of Project construction, LAWA calculated the L_{eq} sound levels at each of the 11 noise-sensitive receptors identified in Table 4.7.3-5 of the Draft EIR, using the respective distances from construction activities that are indicated in that table, and compared those sound levels to the estimated background ambient Leq level for evening and nighttime hours (i.e., between 7:00 pm and 7:00 am) at each receptor location. The results of that analysis indicated that the locations of noise-sensitive receptors projected to experience a 5 dBA or more increase in Leq ambient sound levels due to Project-related construction would be the same as those experiencing such an increase based on CNEL, as shown in Table 4.7.3-5 of the Draft EIR (i.e., there would be a 5 dBA or more increase in ambient noise levels at the Residence Inn by Marriott, Sheraton Gateway, H Hotel/Homewood Suites, Hyatt Regency, and Courtyard Los Angeles LAX/Century Boulevard).

With regard to the commenter's reference to "peak hourly average," use of the term 'peak-hour' in conjunction with a sound level metric is normally limited to considerations of roadway traffic noise. The Draft EIR discloses peak-hour traffic Leq data in Table 7 of Appendix F.2 and provides a discussion of impact assessment based on peak-hour Leq for roadway traffic noise in Section 4.7.2 of the Draft EIR.

Comparison of data to ambient conditions at each identified receptor during daytime, evening, nighttime and early morning hours is not a requirement under CEQA, nor is it recommended in the L.A. CEQA Thresholds Guide and was, therefore, not included in this Draft EIR.

Finally, Mitigation Measure MM-CN (ATMP)-1, Construction Noise Control Plans, addresses the potential for construction impacts to occur based on an increase in modeled dBA. The measure requires Construction Noise Control Plans for all phases of landside or terminal improvements. The plan must address noise-sensitive land uses

proximate to each construction location. If, based on modeling, "the calculated construction-related noise levels indicate an increase of 5 dBA over the existing exterior noise level at any noise-sensitive receptor, the noise control plan shall specify provisions and/or measures to be implemented during construction that will attenuate construction noise levels to be less than 5 dBA over the existing exterior noise level." The measure lists noise attenuation measures available to reduce construction noise below the 5 dBA performance standard. Additionally, to field-verify the effectiveness of construction noise attenuation measures, such as noise curtains, noise blankets, temporary sound walls, or their equivalent if needed, Mitigation Measure MM-CN (ATMP)-1 has been modified to require that noise measurements be taken at the closest noise-sensitive receptors to confirm that the attenuated construction noise levels are less than 5 dBA over the existing exterior noise level. Please see Chapter F3, Corrections and Clarifications to the Draft EIR, regarding incorporation of these changes into the Final EIR.

[1] FHWA. March 2019. Highway Traffic and Construction Noise Model. https://www.fhwa.dot.gov/environment/noise/construction_noise/rcnm/. Accessed June 2021.
[2] City of Los Angeles, L.A. CEQA Thresholds Guide, Your Resource for Preparing CEQA Analyses in Los Angeles, page I.2-2, 2006. Available: https://planning.lacity.org/odocument/cc8fb2f5-dc6c-47f1-bfc3-864b84621abb/CEQAThresholdsGuide.pdf.
[3] City of Los Angeles, L.A. CEQA Thresholds Guide, Your Resource for Preparing CEQA Analyses in Los Angeles, page I.1-4, 2006. Available: https://planning.lacity.org/odocument/cc8fb2f5-dc6c-47f1-bfc3-864b84621abb/CEQAThresholdsGuide.pdf.
[4] City of Los Angeles, Los Angeles World Airports, Final Environmental Impact Report for Los Angeles International Airport (LAX) Specific Plan Amendment Study, (SCH 1997061047), Section 4.10.3 – Construction Traffic and Equipment Noise, January 2013. Available: https://www.lawa.org/en/lawa-our-lax/environmental-documents/documents-certified/specific-plan-amendment-study/documents.
[5] City of Los Angeles, Los Angeles World Airports, Final Environmental Impact Report for Los Angeles International Airport (LAX) Landside Access Modernization Program, (SCH 2015021014), Section 4.9 – Noise, February 2017. Available: https://www.lawa.org/en/connectinglax/automated-people-mover/documents.
[6] City of Los Angeles, L.A. CEQA Thresholds Guide, Your Resource for Preparing CEQA Analyses in Los Angeles, page I.1-3, 2006. Available: https://planning.lacity.org/odocument/cc8fb2f5-dc6c-47f1-bfc3-864b84621abb/CEQAThresholdsGuide.pdf.

ATMP-AL010-89

Comment: It also does not appear that noise measurements were taken to the south of the airport—in contrast to numerous measurements taken at the north side—despite the fact that the Project includes major components on the south side of the airport, including Terminal 9, the proposed Taxiway C extension, potential construction staging

(including concrete-mixing) at the Continental City site, and proposed truck hauling along Imperial Highway or other haul routes in or adjacent to El Segundo.

Response: This comment is similar in content to comment ATMP-AL010-90; please refer to Response to Comment ATMP-AL010-90. It should be noted that the Project-related construction that is referenced in the comment (i.e., Terminal 9 and the proposed Taxiway C extension) is located well over 4,000 feet from the nearest noise-sensitive receptors, where baseline (2018) conditions indicate that aircraft noise levels alone are over 70 dBA CNEL (see Figure 4.7.1-6 of the Draft EIR). At that distance, the construction-related reference noise level of 97.0 dBA at 50 feet (see Section 4.7.3.2.2 of the Draft EIR), would attenuate down to 58.9 dBA at the nearest noise-sensitive receptors.

Setting aside the exclusion of the impact of traffic noise along Imperial Highway from consideration in the ambient noise environment, which would lessen any contribution of construction noise to the ambient noise environment, with existing aircraft noise levels above 70 dBA CNEL along the southern edge of LAX where those receptors are located, it is not mathematically possible that the attenuated construction-related reference noise level of 58.9 dBA would contribute to the overall noise at the nearest noise-sensitive receptors in any substantial way (see calculation below).

$$10\ x\ Log_{10}\left(10^{\frac{\mathbf{70}}{10}\,dBA} +\ 10^{\frac{\mathbf{58.9}}{10}\,dBA}\right) = 70.3\ dBA$$

In light of these facts, noise measurements on the south side of the airport, as suggested by the commenter, are not needed in order to substantiate the conclusion that construction of those Project elements would result in a significant impact (i.e., would result in ambient noise levels increasing by 3 dBA or more in CNEL). Instead, it would result in an maximum increase of 0.3 dBA in ambient noise levels, excluding the contribution of roadway traffic noise from Imperial Highway.

ATMP-AL010-90

Comment: The DEIR identifies Imperial Highway and other routes in or adjacent to El Segundo as construction haul routes. DEIR at p. 2-82 (Figure 2-29). This diagram also identifies the Continental City site, adjacent to El Segundo, as a potential construction staging area. Id. Despite these potential detrimental impacts to El Segundo's sensitive noise receptors, LAWA has only placed one Construction Noise Analysis Receptor on the southside of the airport. Id. at p. 4.7.3-6 (Construction Staging Area Receptor S8 located in a residential south of airport land use setting.) Further, the diagram showing the receptors near construction does not even show this receptor on the south side of LAX. Id. at 4.7.3-3 (Figure 4.7.3-1). LAWA must include additional noise measurements and receptors from the south of the airport in order to evaluate whether these components' impacts would exceed the threshold of 5 dBA over ambient levels.

Response: See Response to Comment ATMP-AL010-72 regarding haul route noise impacts. Construction staging at the southern end of LAX near El Segundo is analyzed at the

closest residential area to the Continental City staging area site (approximately 750 feet), Receptor ID S8, which has a baseline CNEL value of 65.9 dBA, meaning the significance threshold is based on whether construction equipment noise would exceed existing ambient exterior noise levels by 5 dBA or more (see Section 4.7.3.4.2). As a result, for Receptor ID S8, the significance threshold is 71.1 dBA (or 66.1 dBA plus 5 dBA). The predicted total CNEL value, including construction equipment noise at the staging area is 69.9 dBA CNEL at Receptor ID S8, which is below the significant impact threshold of 71.1. The Continental City staging area site is also an active and on-going staging area and rock crushing facility and is not considered a new sound source to the area. The location of S8 was used because it represents the worst-case sound level from the staging area, inclusion of additional receptors would have lower sound levels than S8.

Additionally, the nearest construction activities at Terminal 9 and the improvement and extension of Taxiway C are approximately one mile away or greater from the City of El Segundo. Sound levels from construction would attenuate to levels lower than existing sound levels at this distance. Additionally, there are other intervening land uses between El Segundo and Terminal 9 (I-105 and the South LAX Runway) which would attenuate construction noise levels from construction of Terminal 9. For these reasons, construction equipment noise is unlikely to exceed or approach the threshold of 5 dBA over ambient conditions. For these reasons, additional receptor analysis and noise measurements will not be undertaken.

Figure 4.7.3-1 of the Draft EIR shows representative types of noise-sensitive receptors located in the vicinity of construction areas for the proposed Project. There is no Project-related construction in the vicinity of the south side of the airport. As such, there is no need to revise Figure 4.7.3-1, as requested by the commenter. Noise-sensitive receptors located in the vicinity of construction staging areas are shown in Figure 4.7.3-2. Staging area site S8 is shown in Figure 4.7.3-2 along with other construction staging areas that would be utilized to mobilize and manage construction equipment and/or supplies.

In addition, Mitigation Measure MM-CN (ATMP)-1, Construction Noise Control Plans, applies to all landside and terminal construction, including construction of Terminal 9. The measure provides for site-specific analysis and a plan to reduce construction noise so that it does not exceed an increase of 5 dBA at noise-sensitive receptors. It should also be noted that, to field-verify the effectiveness of construction noise attenuation measures, such as noise curtains, noise blankets, temporary sound walls, or their equivalent if needed, Mitigation Measure MM-CN (ATMP)-1 has been modified to now require that noise measurements be taken at the closest noise-sensitive receptors to confirm that the attenuated construction noise levels are less than 5 dBA over the existing exterior noise level. Please see Chapter F3, Corrections and Clarifications to the Draft EIR, regarding incorporation of these changes into the Final EIR.

ATMP-AL010-91

Comment: For the foregoing reasons, the finding that construction noise impacts would be mitigable with "Construction Noise Control Plans" is unsupported by substantial evidence. The DEIR fails to disclose the true nature or extent of these construction noise impacts. Thus, MM-CN (ATMP)-1—which furthermore, is based on the inadequate CNEL

metric, rather than hourly similar metric—cannot be found to mitigate this significant noise impact to less-than-significant.

Response: The comment is a summary assertion based on the individual construction noise-related comments that precede the statement. Please see Responses to Comments ATMP-AL010-85 through ATMP-AL010-90 above for responses to those comments.

ATMP-AL010-92

Comment: Furthermore, given the potential for significant noise impacts to El Segundo from construction staging at the Continental City site, LAWA should remove this staging location from the ATMP. Even removing the use of this site, LAWA must evaluate and quantify the increase in noise attributable to construction staging and identify all feasible mitigation to reduce these impacts.

Response: Potential construction noise impacts associated with construction staging at the Continental City site are addressed in Section 4.7.3.5.2.1 of the Draft EIR. The Continental City site is identified as the Southeast Construction Staging Area on Figure 4.7.3-2 of the Draft EIR. As described in the analysis of impacts associated with use of that area for construction staging, which is presented on pages 4.7.3-20 and 4.7.3-21 of the Draft EIR, potential noise impacts would be less than significant. As such, there is no basis to remove this staging area location from the proposed Project, as requested by the commenter. Regarding the last sentence of the comment, which indicates "LAWA must evaluate and quantify the increase in noise attributable to construction staging and identify all feasible mitigation to reduce these impacts," Section 4.7.3.5.2.1 of the Draft EIR evaluates noise impacts at each of the potential construction staging areas and Table 4.7.3-6 provides quantification of noise attributable to construction staging at each area. As indicated in the subject section and table, there would be no significant impacts from construction staging. As such, mitigation is not warranted.

ATMP-AL010-93

Comment: 8. The DEIR Fails to Adequately Analyze or Mitigate Roadway Traffic Noise.

The Svinth Report finds the DEIR's analysis of roadway traffic noise deficient in multiple respects. First, the DEIR fails to adequately measure existing traffic noise because it is based solely on short-term traffic noise level measurements, rather than a combination of short-term measurements with long-term reference noise measurements, Long-term reference noise measurements are necessary to properly establish peak hour traffic noise levels. Svinth Report at p. 4.

Response: Short-term roadway traffic noise measurements were used to validate the traffic noise model in accordance with FHWA traffic noise prediction methodology and guidelines. These methods are industry standard for roadway traffic noise analysis and used extensively throughout the United States. With the noise model validated, the existing conditions was then modeled based on the local traffic network data and then combined

with the predicted existing aircraft noise to determine the existing noise conditions. Roadway traffic noise levels, including peak hour conditions, were established by using roadway traffic that includes hourly traffic volumes for typical 24-hour cycles. Where applicable, such as in relation to Caltrans and FHWA thresholds, the peak hour was used to determine impact conditions.

As discussed in Section 1.3.1 in Appendix F.1 of the Draft EIR, Title 23 of the Code of Federal Regulations, Part 772 (23 CFR 772) provides the framework and establishes the standards for the assessment and abatement of highway traffic noise in the United States. 23 CFR 772 applies to all federal or federal-aid highway projects authorized under Title 23 of the United States Code. The proposed Project does not fit this description; however, it is standard practice to conduct roadway noise analyses in the United States using the FHWA prediction methods. As defined in the regulations, a traffic noise impact would occur for a particular activity category when predicted exterior noise levels approach or exceed the FHWA noise abatement criteria level during the loudest hour of the day for that category or when project-related noise creates a substantial noise increase over existing noise levels. Caltrans is responsible for implementing FHWA's policies in California and has developed their Traffic Noise Analysis Protocol for New Highway Construction, Reconstruction, and Retrofit Barrier Projects[1] (the Protocol) in the State of California. Caltrans has also published a guidance document that supplements the Protocol and serves to assist highway noise analysts with the technical aspects of traffic noise analysis predictions.[2]

For all of these reasons, the use of short-term monitoring to validate the roadway traffic noise model and predict existing highway noise is appropriate for the proposed Project's roadway traffic noise analysis.

The rest of the comment regarding noise measurements is similar in content to comment ATMP-AL010-87; please refer to Response to Comment ATMP-AL010-87.

[1] California Department of Transportation, Traffic Noise Analysis Protocol for New Highway Construction, Reconstruction, and Retrofit Barrier Projects, April 2020. Available: https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/traffic-noise-protocol-april-2020-a11y.pdf.
[2] California Department of Transportation, Division of Environmental Analysis, Technical Noise Supplement to the Caltrans Traffic Noise Analysis Protocol – A Guide for the Measuring, Modeling, and Abating Highway Operation and Construction Noise Impacts, Report No. CT-HWANP-RT-13-069.25.2, September 2013. Available: http://www.dot.ca.gov/env/noise/docs/tens-sep2013.pdf.

ATMP-AL010-94

Comment: Second, the DEIR uses a too-high threshold of significance to analyze traffic noise, effectively determining such noise impacts to be significant only if they more than double the background noise. To the contrary, as the Svinth Report explains, a peak hour Leq increase of 3 to 5 dBA is a proper threshold for traffic noise impacts. Use of this

threshold, instead of the DEIR's peak hour "L" increase of 12 dBA, would disclose more receptors than the DEIR currently discloses which would be subject to a significant increase in Project traffic noise. Id.

Response: Impact thresholds for the Draft EIR are consistent with previous noise studies at LAX (e.g., for the LAX Landside Access Modernization Program) and local CEQA requirements in Los Angeles. As discussed in Section 4.7.2.4 of the Draft EIR, the specific roadway traffic noise Impact thresholds were determined by both Caltrans substantial increase impact and the City of Los Angeles Noise Element of the General Plan.

As discussed in Section 4.7.2.3.1 of the Draft EIR, according to the Caltrans Traffic Noise Analysis Protocol[1] and consistent with 23 CFR 772, a traffic noise impact occurs when future project noise levels cause a substantial noise increase over existing noise. Specifically, a substantial increase occurs when a project's predicted worst-hour design-year noise level exceeds the existing worst-hour noise level by 12 dBA or more.

The City of Los Angeles Municipal Code (LAMC) (Section 41.40 and Chapter XI, Articles 1 through 6) provides regulations regarding allowable increases in noise levels in terms of established noise criteria. Supplementing these LAMC regulations, the City has also established CNEL guidelines that are used for land use planning purposes (see discussion of City of Los Angeles Noise Element of the General Plan below).

Chapter XI of the Los Angeles Municipal Code (City of Los Angeles Noise Ordinance) establishes acceptable ambient sound levels to regulate intrusive noises within specific land use zones. In accordance with the City's Noise Ordinance, a noise level increase of 5 dBA over the existing average ambient noise level at an adjacent property line is considered a noise violation.

The Noise Element of the City of Los Angeles General Plan[2] addresses noise mitigation regulations, strategies, and programs and delineates federal, state, and City jurisdiction relative to rail, automotive, aircraft, and nuisance noise. The City of Los Angeles has adopted local guidelines based, in part, on the community noise compatibility guidelines established by the California Department of Health Services for use in assessing the compatibility of various land use types with a range of noise levels. CNEL guidelines for specific land uses are classified into four categories: (1) "normally acceptable," (2) "conditionally acceptable," (3) "normally unacceptable," and (4) "clearly unacceptable." As shown in Table 4.7.2-2 of the Draft EIR, a CNEL value of 60 dBA is the limit at which the noise environment for multi-family residential uses changes from "normally acceptable" to "conditionally acceptable." A CNEL as high as 65 dBA is considered "conditionally acceptable." The limit of what is considered "normally unacceptable" for all residential uses is set at 75 dBA CNEL.

[1] California Department of Transportation, Traffic Noise Analysis Protocol for New Highway Construction, Reconstruction, and Retrofit Barrier Projects, April 2020. Available: https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/traffic-noise-protocol-april-2020-a11y.pdf.

[2] City of Los Angeles, Department of City Planning, Noise Element of the Los Angeles City General Plan, adopted February 3, 1999. Available: https://planning.lacity.org/odocument/b49a8631-19b2-4477-8c7f-08b48093cddd/Noise_Element.pdf.

ATMP-AL010-95

Comment: Third, as with aviation noise impacts, the Svinth Report opines that the future traffic analysis study year should be substantially further ahead than just 9 years from the baseline year. As noted earlier, many large projects use study years 20 years into the future to measure traffic noise. Svinth Report at p. 5. The failure to analyze traffic noise impacts further into the future casts doubt on the DEIR's unsupported assertion that traffic growth (and thus, traffic noise impacts) would be the same with or without the Project.

Response: The point of this comment is substantively the same as comment ATMP-AL010-76; please refer to Response to Comment ATMP-AL010-76.

ATMP-AL010-96

Comment: 9. The DEIR Fails to Propose Adequate Mitigation to Address the Project's Significant and Unavoidable Noise Impacts.

Under CEQA, mitigation measures must be specific and enforceable. CEQA Guidelines § 15126.4(a)(3); *Oro Fino Gold Mining Corp. v. County of El Dorado* (1990) 225 Cal.App.3d 872, 884-85. LAWA fails to formulate and recommend specific and enforceable mitigation measures for the Project's significant noise impacts, with the result that the majority of the Project's noise impacts are determined to be significant and unavoidable. Moreover, as explained earlier, the DEIR fails even to disclose the full magnitude and duration of the significant and unavoidable impacts it states would occur.

The DEIR relies on the following mitigation measure (MM-AN (ATMP)-1) to address the noise impacts of aircraft operations at LAX on surrounding communities, including El Segundo:

- **MM-AN (ATMP)-1. Sound Insulation Programs.**
  To mitigate significant impacts to noise-sensitive uses that are newly exposed to 65 dBA CNEL or greater from airport operations in future years of the proposed Project, LAWA will update the Noise Exposure Maps (NEM) for LAX in accordance with Title 14 CFR Part 150, prior to project completion. The NEM is the legal document required by FAA to identify noise-sensitive land uses potentially eligible for noise mitigation funding through the FAA's Airport Improvement Program. LAWA will complete the NEM Report and coordinate with FAA to identify any noise-sensitive land uses eligible for noise mitigation and, in accordance with FAA regulations and guidance, apply for noise mitigation funding for eligible noise-sensitive uses. LAWA will work with the appropriate jurisdiction(s) to determine/establish an appropriate implementation program for any eligible noise mitigation. Property owners' eligibility for noise mitigation will be based upon FAA requirements and the LAX Part 150 NEM in effect at the time of operation or completion of the Project.

This measure is similar to many prior mitigation measures promised by LAWA. For example the 2004 Master Plan included MM-LU1, which called for LAWA to update, expand, accelerate, and report on implementation of its Aircraft Noise Mitigation Program ("ANMP"), which includes RSI for residences around LAX consistent with state law. Likewise, the West Aircraft Maintenance Area Project included MM-N-1, which reconfirmed LAWA's obligation to implement its ANMP. Simply stated, LAWA has consistently pointed to its ANMP generally and RSI treatment specifically, to argue that LAX noise impacts to surrounding residents will be mitigated as required by CEQA. Unfortunately, although the areas that need RSI treatment have remained relatively constant, LAWA has not made any appreciable progress recently toward providing needed RSI in El Segundo. Simply put, although LAWA acknowledges its RSI obligations, it has failed to follow through on that promise of mitigation.

LAWA's most recent (2019) progress report for the 2004 Master Plan MMRP[47] summarizes 2004 Master Plan included MM-LU1 and LAWA's progress toward implementation as follows: "The ANMP describes ongoing LAWA efforts to convert existing incompatible land uses surrounding LAX to compatible land uses through the implementation of two noise mitigation strategies: (1) sound insulation of structures; and (2) acquisition of property followed by the conversion of incompatible land use to compatible land use. The ANMP implementation reduces adverse noise impacts and achieves airport standards as set forth in Title 21 of the California Code of Regulations. LAWA also periodically submits ANMP reports to the State of California as a condition of LAWA's Variance as LAWA continues working to achieve land use compatibility.

"LAWA completed the soundproofing program for the City of Los Angeles in 2014 and continues to fund and oversee residential sound insulation programs implemented by the City of Inglewood and County of Los Angeles. LAWA also continues to convert incompatible land use to compatible land use through the Residential Acquisition Program."

The first thing to note about the 2019 progress report is that LAWA acknowledges it completed RSI for homes within the City of Los Angeles back in 2014, which indicates compliance with the mitigation measure is feasible when LAWA makes the necessary commitment of time, attention, and resources. When it came to RSI benefitting residents of Los Angeles, LAWA was apparently willing to make that commitment. Also noteworthy is the fact that LAWA provides no clear timeline or commitment of resources in the mitigation measure for the completion of RSI for homes outside the City of Los Angeles. It is difficult not to conclude from this that LAWA has prioritized Los Angeles residents over non-residents.

Additionally, the progress report makes no mention at all of El Segundo and does not acknowledge LAWA's obligation to implement RSI in El Segundo. The City of El Segundo ran the RSI program within its boundaries until it was suspended in 2016 and terminated in July of 2018. El Segundo handed the program over to LAWA at that time due to a number of concerns over changes mandated by LAWA and FAA. See Exhibit 16, October 18, 2018 Letter to LAWA re El Segundo RSI Program Termination; Exhibit 17, November 14, 2018 Letter to FAA re El Segundo RSI Program Termination. Since that hand-off LAWA

has made no appreciable progress toward advancing RSI in El Segundo despite its clear legal obligations to do so. In fact, LAWA has repeatedly resisted and delayed doing RSI despite consistent requests and offers of cooperation by El Segundo. LAWA initially attempted to avoid responsibility, but now seems to accept that as the operator of LAX, it must proceed with RSI in El Segundo. Recently, LAWA has indicated that it may retain a consultant to run the RSI program in El Segundo, but has yet to even issue the RFP for those consultant services, which makes LAWA's timing for any consultant contract award unknown and uncertain. See Exhibit 18, September 18, 2020 Letter to LAWA re Compliance with Stipulated Variance; Exhibit 19, October 1, 2020 Letter from LAWA to El Segundo re Variance Compliance Plan; Exhibit 20, February 5, 2021 Letter to LAWA re Compliance with Stipulated Variance. Such delay and uncertainty are inconsistent with LAWA's obligations under prior CEQA mitigation measures.

LAWA's delay in implementing RSI in El Segundo is also inconsistent with the variance for LAX as issued by Caltrans under state law. The most recent (2020) variance is provided in Exhibit 21, 2020 LAX Stipulated Variance. It provides that LAWA must continue to implement and update its ANMP and "use its best efforts to complete the acoustic treatment portion of the total ANMP for all affected jurisdictions within nine years from the effective date of this decision." In order to meet this schedule and complete RSI by 2028-2029, LAWA should already have started an RSI program in El Segundo, but it has not yet made the necessary commitment of time, attention, and resources.

LAWA's ongoing failure to proceed with RSI in El Segundo is inconsistent with state law, the variance for LAX as issued by Caltrans, LAWA's obligations under existing CEQA mitigation measures, and the Noise Element of the City of Los Angeles' General Plan, Policy 1.1 of which requires that LAX's noise impact "be reduced to achieve zero incompatible uses within a CNEL of 65 dB airport noise exposure area," as required by Caltrans' regulations. LAWA's ongoing failure to act also undermines its reliance on MM-AN (ATMP)-1 in the DEIR. Simply stated, because LAWA is already out of compliance with similar measures adopted as part of prior projects and has not demonstrated the necessary commitment to proceed with RSI in El Segundo, it cannot reasonably rely on MM-AN (ATMP)-1 to mitigate the impacts of ATMP noise. To address this problem, MM-AN (ATMP)-1 must be revised to include clear and enforceable timelines and funding levels for completion of RSI. In the absence of such timelines and funding, the mitigation measure is ineffective and inadequate under CEQA.

As a step toward demonstrating a commitment to noise reduction in El Segundo, LAWA should partner with El Segundo on LAWA's existing Fly Quieter Program,[48] described as an existing local regulation in the DEIR. DEIR at p. 4.7.1-25. As part of this partnership, LAWA would provide El Segundo with regular updates on LAWA's progress on noise mitigation in El Segundo, and involve El Segundo in decisions regarding which airlines should receive positive recognition with respect to noise impacting El Segundo. That recognition may include a formal commendation from the City of El Segundo. Additionally, El Segundo requests that LAWA produce and publish on its website a quarterly "snapshot" report/map showing the current location, size and configuration for all passenger gates in existence at LAX. This inventory will include all aircraft gates (contact and remote) and will be comparable to DEIR, Appendix B.2, Exhibit 2-3. El

Segundo also requests that LAWA continue to provide representatives of El Segundo with an opportunity to conduct an escorted physical gate count once per year. The gate count enables El Segundo to better understand the sources of the airport's noise impact on residents so that El Segundo can work with LAWA to address them.

[47] Available at https://www.lawa.org/-/media/lawa-web/lawa-our-lax/studies-and-reports/mitigation-monitoring/mmrp_2019.ashx; last accessed Feb. 9, 2021.
[48] Available at https://www.lawa.org/lawa-environment/noise-management/lawa-noise-management-lax/lax-fly-quieter-program; last accessed Feb. 9, 2021.

Response: As agreed to with noise-impacted jurisdictions (i.e., County of Los Angeles for unincorporated areas near LAX and the cities of Los Angeles, El Segundo, and Inglewood) when the Federal Aviation Regulations (FAR) Part 150 program for LAX was approved by the FAA (see Section 4.7.1.3.1.1 for a description of FAR Part 150), each jurisdiction would implement its own noise mitigation program involving residential sound insulation (RSI) and/or land acquisition in order to have more direct control, while obtaining funding from FAA and/or LAWA. Because the programs are voluntary and dependent on FAA funding, finite schedules were not established. When the City of Los Angeles was unable to establish a program in a timely manner, it fell to LAWA to directly implement the RSI program, which was initiated in 1997, closed to new applications in 2010 and completed in 2014. LAX Passenger Facility Charge (PFC) funds were used to fund the City's program.

In the meantime, the City of El Segundo initiated its program in 1992 using only FAA Airport Improvement Program (AIP) funds, given that El Segundo did not agree to have homeowners provide an avigation easement to LAWA in return for LAWA providing the 20 percent local match required for AIP funding. Homeowners provided the additional 20 percent themselves. As such, the RSI implementation in El Segundo may have initially been slowed by the City of El Segundo's decision to rely solely on FAA AIP funds, and the resulting requirement that residents provide 20 percent of the funding for sound proofing their structures.

In 2006, LAWA agreed not to obtain easements for RSI funding from any jurisdiction. El Segundo thereafter accepted the local match funding from LAWA. As a result, homeowners were no longer required to provide 20 percent of the funding. El Segundo assumed responsibility for the RSI schedule/program timeline. The City of El Segundo did not, however, follow commonly accepted protocol in conducting outreach and prioritizing project areas (most impacted being mitigated first), consequently missing opportunities for a more efficient program implementation, and permitting owner upgrades that were not approved by FAA.

El Segundo suspended its program in 2016 and eventually terminated it in 2018, after FAA rescinded El Segundo's AIP grant based on El Segundo's inability to gain FAA approval of their design specifications and to move forward with the program as required under Program Guidance Letter 12-09.

Over the 25+ year RSI Program, El Segundo received approximately $100 million in funding from FAA and LAWA, and mitigated just over 1,900 dwelling units.

The comment states that LAWA has adopted mitigation similar to MM-AN (ATMP)-1 in connection with past projects, but has not followed through with implementing that mitigation, and therefore cannot be trusted to carry out MM-AN (ATMP)-1. LAWA disagrees with this comment. The comment cites two projects in which similar mitigation was adopted: the 2004 Master Plan (MM-LU1) and the West Aircraft Maintenance Area Project. LAWA approved these projects in 2004 and 2014, respectively. In both cases, the projects were approved at a time when El Segundo had elected to implement the RSI program. As noted above, El Segundo did not relinquish this program until 2018.

LAWA does have the ultimate responsibility to obtain compliance with Title 21, Airport Noise Standards. As stated in the LAX Variance issued by Caltrans in August 2020 (Exhibit 21 of the commenter's comment letter), LAX "shall use its *best efforts* (emphasis added) to complete the acoustic portion of the total ANMP for all affected jurisdictions within nine years from the effective date of the Order from Caltrans…" LAWA is preparing to release a Request for Proposals (RFP) to hire a consultant to establish and implement the LAX RSI Program, which includes the City of El Segundo. Because the RSI program is voluntary and funding is currently provided through FAA AIP grants, it is uncertain as to how long the program will take to complete. LAWA is committed to use its best efforts to carry out the program.

Regarding the commenter's suggestions on how LAWA should partner with the City of El Segundo regarding noise-related matters at LAX and regarding and the number and layout of gates at LAX, the suggestions are noted and are hereby part of the Final EIR, and will be forwarded to decision-makers for their consideration prior to taking any action on the LAX Airfield and Terminal Modernization Project.

ATMP-AL010-97

Comment: C. The DEIR Fails to Adequately Evaluate or Mitigate the Project's Transportation Impacts

1. The DEIR Underestimates the Project's Transportation Impacts Because It Incorrectly Assumes the Project Would Not Increase Passenger Activity.

The DEIR's transportation analysis attempts to obscure the fact that the Project will have any environmental impacts at all. As discussed above, the overarching flaw in the DEIR is that growth in aviation activity—and all the impacts associated with it—will occur with or without the Project; on this basis, the DEIR attempts to assure readers that many of the Project's effects would be essentially the same regardless of whether the Project is built. See DEIR at p. 4.8-58 (stating that passenger VMT would change slightly as a result of the Project and that "[t]his is due to an increase in the passenger activity at LAX by year 2028, when passenger levels are projected to increase to 110.8 million annual passengers (MAP) with or without implementation of the proposed Project."). In effect, the assumption is that the proposed Project is intended to accommodate passenger demand that will occur regardless of whether the Project is completed; passenger traffic will simply be redistributed within the airport and no off-site traffic impacts will be

associated with those passengers. See DEIR at p. 4.8-39 (Table 4.8-7) showing that the only trips associated with the Project are 4,700 estimated employee trips from Concourse 0 and Terminal 9.

As discussed above, the Project would remove an existing constraint on growth. Once this constraint is removed, it is inevitable that there will be an increase in passenger activity with a corresponding increase in passenger trips.

Response: As explained in the following responses, the Draft EIR's analysis of transportation impacts complies with CEQA. The commenter alleges that the Draft EIR has an overarching flaw regarding the assumed growth in aviation activity. Please see Response to Comment ATMP-AL010-205 for further discussion of substantial evidence provided in the Draft EIR to support the conclusion that the incremental benefit of east flow operating configurations provided by the proposed Project improvements does not change the results of the forecasts of aircraft operations and passengers.

The commenter proceeds to discuss the passenger traffic analyses documented in the Draft EIR. This comment is essentially the same as the one provided by one of the commenter's consulting firms (Griffin Cove Transportation Consulting PLLC), which was numbered comment ATMP-AL010-244. Please see Response to Comment ATMP-AL010-244.

The commenter asserts that the proposed Project would "remove an existing constraint on growth." This assertion is incorrect, as documented in Section 4.3 of Appendix B.1 of the Draft EIR and as further explained in Topical Response TR-ATMP-G-1. Landside improvements associated with the proposed Project would not remove existing constraints to growth. As documented, LAX has accommodated growing numbers of passengers since 2009 while traffic congestion in the Central Terminal Area (CTA) and surrounding roadways also increased. Also, please see Response to Comment ATMP-AL010-109 for further discussion regarding factors influencing airline schedules and passenger demand, as well as a discussion of the passenger-related VMT.

ATMP-AL010-98

Comment: 2. The DEIR Fails to Disclose the Project's Transportation Impacts Because it Analyzes Impacts Against a Future (2028) Baseline and Does Not Evaluate Impacts Beyond 2028.

The DEIR uses a projected future conditions baseline in the analysis of transportation impacts, stating that such an approach is appropriate because "substantial evidence in the record" demonstrates that certain transportation improvements contemplated by the LAMP are scheduled for completion in 2028 and that it would be misleading and without informative value to analyze the Project's impacts without accounting for these improvements. DEIR at pp. 4-4, 4.8-32. The DEIR also suggests that using an Existing (2019) Conditions Baseline would be misleading as it would confound the ability to distinguish VMT changes in 2028 that are due to the proposed Project from the VMT changes in 2028 that are due to Phase 1 of the LAMP. DEIR at pp. 4.8-6, 4.8-32.

CEQA does allow a lead agency to rely on a future baseline under limited conditions. In *Neighbors for Smart Rail*, 57 Cal.4th 439, the California Supreme Court recognized that, under limited circumstances, a departure from existing conditions (i.e., NOP date) may be appropriate. But only when "justified by substantial evidence that an analysis based on existing conditions would tend to be misleading or without informational value to EIR users." Id. at p. 445. Here, the DEIR does not provide evidentiary support that all of the Phase 1 LAMP transportation projects (APM, ITF East, ITF West, CONRAC) would be constructed and operational by 2028.[49] If these improvements are not completed by 2028, it is misleading to rely on 2028 for purposes of evaluating the Project's transportation impacts. See DEIR at pp. 4.8-32, 4.8-33, explaining that the LAMP transportation improvements will substantially change the surface transportation characteristics around the airport, including VMT.[50]

[49] The DEIR also asserts that Metro's Crenshaw/LAX Line and the AMC 96th Street Transit Station will also be completed by 2028, including an interface between the station and the LAMP facilities. DEIR at pp. 4.8-33, 4.8-36. The DEIR lacks support for these assertions. Metro has reduced its budget substantially due to COVID-19, with cuts to new rail lines. See Laura J. Nelson, "L.A. Metro cuts budget by $1.2 billion, locking in steep reduction to bus, rail service", Los Angeles Times, Sept. 24, 2020 (available at https://www.latimes.com/california/story/2020-09-24/metro-bus-train-service-cuts-coronavirus-pandemic-budget; last accessed Feb. 9, 2021). The DEIR makes no mention of whether these transit projects are still on schedule to be completed by 2028. The DEIR also states that certain regional roadway improvements included in SCAG's 2016-2040 RTP/SCS were included in the Future Conditions baseline (2028) model (DEIR at p. 4.8-35); however, the document does not identify these projects.

[50] As explained at the beginning of these comments, per the 2017 settlement, El Segundo has not challenged, and would not challenge LAWA's implementation of LAMP as originally approved and as clearly described in the 2017 settlement agreement. The 2017 settlement does not, however, preclude El Segundo from challenging the changes to LAMP that LAWA is now proposing as part of the ATMP.

Response: The basis for assuming 2028 as the baseline year for the transportation impacts analysis is explained in the Analytical Framework discussion in the introduction to Chapter 4 of the Draft EIR, and is reiterated in Section 4.8.1.1. As indicated therein, the 2028 baseline accounts for the completion of the LAX Landside Access Modernization Program and Metro improvements that would be completed prior to completion of the LAX Airfield and Terminal Modernization Project, which would substantially change the ground access characteristics around LAX independent of the proposed Project. Awarded under separate contracts, construction of the LAX Landside Access Modernization Program project, including the LAX Automated People Mover (APM), ITF West, roadway work, and Consolidated Rental Car Facility, is already well underway, with operation of all project elements anticipated to occur in 2023. The commenter provides no information to support a hypothetical situation that completion of those facilities are delayed by five years and they would not be operational by 2028. The commenter also questions whether completion of Metro's Crenshaw/LAX Line and the Airport Metro Connector (AMC) 96th Street Transit Station would occur by 2028, and references a Los Angeles Times article that describes substantial budget reductions within Metro due to the

COVID-19 pandemic. The subject article focuses primarily on reductions in bus and rail service, and makes brief mention of trimming "the budgets for dozens of other Metro initiatives, including new rail lines and behind-the-scenes planning work." LAWA is not aware of any indication from Metro that it is cutting back on, or delaying the completion of, capital projects that are currently underway, such as the two Metro projects noted above. The construction contract for the AMC 96th Street Transit Station has been awarded and construction of the Crenshaw/LAX Line has been underway for several years, with completion anticipated to occur in the near future. Again, the commenter provides no basis to support a hypothetical situation that completion of those facilities would be delayed by five to seven years. Thus, substantial evidence demonstrates that it would be misleading and without informative value to analyze the Project's impacts without accounting for these improvements. These are precisely the circumstances under which State CEQA Guidelines Section 15125 (a)(2) encourages use of a projected future conditions baseline.

With respect to the comment that the Draft EIR should have analyzed impacts beyond 2028, please see Topical Response TR-ATMP-G-3 regarding the reasons why 2028 is the appropriate horizon year for evaluating the impacts of the proposed Project. In addition, Topical Response TR-ATMP-G-3 includes, for informational purposes, a general analysis of impacts beyond 2028.

ATMP-AL010-99

Comment: The use of 2028 as the baseline for evaluating the Project's transportation impacts is even more problematic because the DEIR evaluates the Project's impacts only through 2028. By using 2028 as both the baseline for evaluating impacts and as the Project horizon, the DEIR ignores any impacts from the Project that would occur after 2028. This approach makes no sense. The Airport will continue to operate—and the Project's effect on surface transportation will continue—well beyond 2028. Passenger demand at LAX is projected to increase to 110.8 MAP in fiscal year 2028 compared to 86.1 MAP in fiscal year 2018, almost a 30 percent increase. DEIR at p. 2-17. Passenger activity in the year 2045 is projected to be 127.9 MAP, which represents roughly a 50 percent increase over existing conditions and a 15 percent increase over the 2028 Baseline. By terminating the analysis of the Project's transportation impacts at the year 2028, the DEIR fails to address the effects of this substantial increase in activity at LAX, some of which would certainly be caused by the Project's improvements. This approach deprives the public and decisionmakers of information necessary to a full understanding of the Project's impacts, and divests the DEIR's significance conclusions of evidentiary support. Where, as here, a project will have a long-lasting effect on travel patterns, the lead agency must make a good-faith effort to disclose and analyze the significance of the Project's transportation impacts. *Cleveland National Forest Foundation*, 3 Cal.5th at 513.

Response: Please see Topical Response TR-ATMP-G-3 regarding the reasons why 2028 is the appropriate horizon year for evaluating the impacts of the proposed Project. Please see Response to Comment ATMP-AL010-98, the introduction to Chapter 4 of the Draft EIR, and Section 4.8.1.1 of the Draft EIR regarding the evidence that supports use of a projected future conditions baseline for transportation impacts.

ATMP-AL010-100

Comment: The DEIR should be revised to include an assessment of VMT using two baselines: (1) 2020 (without the LAMP improvements, Metro's public transit improvements and the unidentified roadway projects assumed in the SCAG 2016-2040 RTP/SCS, and which accounts for COVID-19), and (2) 2028 (with all of these roadway and transit projects, assuming the DEIR has evidentiary support that these projects will in in fact be operational by 2028). This first baseline approach would allow decisionmakers and the public to evaluate how the Project would affect the transportation network, including VMT, based on conditions as they exist today.

Response: The need to include the LAX Landside Access Modernization Program improvements in the environmental baseline for the vehicle miles traveled (VMT) impacts analysis is described in the introduction to Chapter 4 and is reiterated in Section 4.8.2.2, the methodology discussion for the VMT analysis, of the Draft EIR. As indicated therein, it is important to include those improvements in the baseline so that the substantial VMT reductions associated with those improvements are not misinterpreted as being reductions attributable to the proposed Project. Please see Response to Comment ATMP-AL010-11 regarding the reasons why using a 2020 COVID-19 pandemic baseline is inappropriate and would not provide a realistic baseline that would give the public and decision-makers the most accurate picture practically possible for the proposed Project's likely impacts. Please see Response to Comment ATMP-AL010-98 regarding evidentiary support that the LAX Landside Access Modernization Program improvements and LA Metro improvements will be operational by 2028. As such, contrary to the commenter's assertion, the Draft EIR should not be revised to include an assessment of VMT using a 2020 COVID-19 pandemic baseline, nor should it be revised to include a 2028 baseline that does not include the LAX Landside Access Modernization Program improvements or the reasonably foreseeable transit and roadway improvement referenced in the comment. In short, revising the baseline, or providing multiple baselines, as proposed by the commenter, would be misleading, would be confusing, and would disregard significant transportation improvements that have been approved and are under construction. LAWA therefore declines to undertake the analysis proposed by the commenter.

ATMP-AL010-101

Comment: 3. The DEIR Relies on Questionable Trip Generation Estimates.

The DEIR identifies trip generation rates associated with the ATMP, but only for the new employees in Concourse 0 and Terminal 9. As discussed above, the DEIR asserts that passenger/operational capacity would be essentially unaffected by any of the Project's improvements Because the DEIR does not acknowledge the Project's growth in passenger activity it also does not recognize the potential for passenger-related vehicular trips.

Response: As documented in Section 3 of Appendix B.2 of the Draft EIR, the Draft EIR carefully analyzed the potential effects of the proposed Project improvements on passenger demand. It concluded that, even though the proposed Project improvements would provide an incremental benefit in the airfield east flow operating configuration (in the form of reduced airfield delays), the forecasted aircraft operations and passenger demand (and airline scheduling practices to meet such demand) in 2028 would not change as a result of the proposed Project improvements. Please see Response to Comment ATMP-AL010-205 for further discuss supporting this conclusion.

As a result, there would be no difference in the future (2028) volume of passenger-related vehicular trips between the proposed Project and the No Project scenario.

ATMP-AL010-102

Comment: The flaws in the DEIR's trip generation estimates extend beyond the DEIR's failure to take into account vehicular trips from increased passenger activity. As transportation engineer Neal Liddicoat explains, the DEIR ignores any non-employee trips associated with the new concourse and terminal. Such trips might include, for example, deliveries, service trips, etc. Liddicoat Report at p. 10.

Response: The content of this comment is substantively the same as comment ATMP-AL010-246; please refer to Response to Comment ATMP-AL010-246. Please also see Response to Comment ATMP-AL010-244.

ATMP-AL010-103

Comment: The DEIR also does not identify peak hour traffic volumes which are needed to determine specific project-related impacts on El Segundo. It is clear that LAWA's traffic consultants have prepared peak hour traffic volumes for the Project as they are referred to in the DEIR's Freeway Safety Analysis. See DEIR at p. 4.8-59; see also DEIR at p. 4.8-4 (acknowledging that the City of Los Angeles Citywide Model, which was used to analyze the proposed Project and alternatives, produces peak hour traffic data).

Response: The content of this comment is similar to comments ATMP-AL010-247 and ATMP-AL010-248; please refer to Responses to Comments ATMP-AL010-247 and ATMP-AL010-248.

ATMP-AL010-104

Comment: The EIR should be revised to correct these problems and recirculated for public review.

Response: This comment is provided as a conclusion to Section V.C.3 of the comment letter, which is identified as comments ATMP-AL010-101 through ATMP-AL010-103 for purposes of this Final EIR. For responses to the comments regarding trip generation estimates included in comments ATMP-AL010-101 through ATMP-AL010-103 above, please see

Responses to Comments ATMP-AL010-101, ATMP-AL010-205, ATMP-AL010-244, and ATMP-AL010-246 through ATMP-AL010-248.

In preparing the Final EIR for the proposed Project, LAWA has reviewed all of the comments received, including the comments identified above, and has carefully considered the responses to these comments and other information provided in the LAX Airfield and Terminal Modernization Project Final EIR. None of the information provided in the Final EIR meets the criteria for recirculation of an EIR as outlined in Section 15088.5 of the State CEQA Guidelines.

ATMP-AL010-105

Comment: 4. The DEIR Fails to Analyze the Project's Consistency with the City of El Segundo's Transportation Plans.

The Los Angeles Department of Transportation indicates that a proposed project should be analyzed for conflicts with transportation-related programs, plans, ordinances, or policies. DEIR at p. 4.8-3. The relevant inquiry is whether the project would conflict with adopted programs, plans, ordinances, or policies addressing the circulation system including transit, roadways, bicycle, and pedestrian facilities. Id. The DEIR conducts such an evaluation for consistency with the City of Los Angeles, Los Angeles County Metropolitan Transportation Authority ("Metro") and SCAG planning documents but does not evaluate the Project's consistency with El Segundo's transportation-related plans, programs, ordinances and policies. DEIR at pp. 4.8-20 through 4.8-23.

Response: The commenter states that the EIR should consider transportation-related plans, programs, ordinances, and policies adopted by the City of El Segundo and that the Los Angeles Department of Transportation (LADOT) requires such analysis. The commenter is correct that LADOT's Transportation Analysis Guidelines (TAG) indicates that a proposed project should be analyzed for conflicts with transportation related programs, plans, ordinances, or policies subject to certain screening criteria, as explained in Section 4.8.2.1 of the Draft EIR. However, the commenter is incorrect that these plans should include those adopted by the City of El Segundo. The proposed Project is not located in the City of El Segundo and is not modifying the transportation network in the City of El Segundo and, therefore, would not conflict with the City of El Segundo's circulation system, including transit, roadways, bicycle, and pedestrian facilities. The transportation analysis for the proposed Project adequately addresses the relevant City of Los Angeles, Los Angeles County, and regional documents, as discussed in Sections 4.8.3.1.3 and 4.8.5.1 of the Draft EIR.

ATMP-AL010-106

Comment: This analysis is particularly important because it is the policy of the City of El Segundo to require level of service ("LOS") analyses for the purpose of assessing traffic impact fees; the City requires that intersections operate at LOS D or better. El Segundo also requires LOS analyses for the purpose of assessing traffic impact fees.

As the Liddicoat Report explains, the LAMP EIR evaluated the Project's consistency with El Segundo's LOS standards and determined that several intersections under the sole or joint jurisdiction of El Segundo were found to operate at LOS E or F. See LAMP DEIR at p. 4.12-92; Liddicoat Report at p. 12. This suggests a reasonable likelihood that a development of the magnitude of the Project would have a significant adverse impact on intersection operations in El Segundo, however, the DEIR ignores this possibility. Id. The revised EIR should evaluate the Project's consistency with El Segundo's transportation-related plans. This evaluation should ensure that the ATMP does not cause El Segundo intersections to fall below LOS E. See Exhibit 22, City of El Segundo General Plan Circulation Element Exhibit C-7. If this evaluation finds significant impacts, it must identify feasible mitigation for these impacts.

Response: Please see Topical Response TR-ATMP-T-1 regarding the assessment of transportation effects associated with the LAX Airfield and Terminal Modernization Project that are not subject to CEQA, which was conducted in accordance with the City of Los Angeles Transportation Assessment Guidelines. As indicated therein, level of service (LOS) is no longer used as a basis for determining significant transportation impacts under CEQA. Moreover, Section 4.8.5.1 of the Draft EIR analyzes the Project's consistency with applicable plans addressing the circulation that were adopted for the protection of the environment. As discussed in that section, based on a review of related City and regional plans, LAWA analyzed the Project for consistency with plans that protect the environment by "support[ing] multimodal transportation options and a reduction in VMT." Given that vehicle delay and LOS are not impacts on the environment, based on the 2018 amendments to the State CEQA Guidelines, plans with transportation policies that focus on vehicle delay and LOS are not plans that were adopted for the protection of the environment. Please also see Response to Comment ATMP-AL010-249, which sets forth claims similar to those in this comment.

ATMP-AL010-107

Comment: 5. The DEIR Fails to Adequately Analyze and Mitigate the Project's VMT Impacts

(a) The DEIR Substantially Underestimates the Project's Potential to Increase VMT.

Notwithstanding the flaws in the DEIR discussed above regarding the document's reliance on a faulty baseline and its failure to analyze impacts beyond 2028, the DEIR underestimates the Project's potential to increase VMT for additional reasons. These points are summarized below; we refer you to the Liddicoat Report for a detailed accounting of these issues.

Response: Regarding the general allegations in the first sentence, please see: Response to Comment ATMP-AL010-100 regarding the baseline used for the transportation analysis in Section 4.8 of the Draft EIR; Responses to Comments ATMP-AL010-109 and 227 regarding the adequacy of the VMT projections in transportation analysis in Section 4.8 of the Draft EIR; and, Topical Response TR-ATMP-G-3 regarding the bases for why 2028 is the appropriate horizon year for evaluating the impacts of the proposed Project. The

remainder of the comment is an introduction to the assertions that follow; please see Responses to Comments ATMP-AL010-108 through ATMP-AL010-110.

ATMP-AL010-108

Comment: The DEIR's VMT analysis addresses three forms of VMT: (1) Daily VMT per Employee; (2) Daily Passenger VMT; and (3) Induced VMT (VMT that is unrelated to airport trips, but is related to the improved roadway operations on nearby surface streets as a result of the Project's roadway projects). DEIR at pp. 4.8-9, 4.8-14. The DEIR concludes that the Project would cause significant impacts with respect to all three types, and that only VMT per Employee could be mitigated to a less than significant level. The DEIR determines that the impacts relating to Passenger VMT and Induced VMT would be significant and unavoidable.

As the Liddicoat Report explains, it is unclear whether the DEIR's roadway network assumptions accurately account for the Project's travel paths and the associated distances required of visitors to LAX. Liddicoat goes on to state, "[s]ome of the ATMP-proposed travel paths are substantially different from the travel paths associated with the approved LAMP project, Phase 1 of which serves as the baseline for the ATMP Project analysis. And, more to the point, it is uncertain whether the model-generated VMT values fully account for the travel distances directly associated with the proposed ATMP Project roadway system change." Liddicoat Report at pp. 2, 3. The Liddicoat Report determines that implementation of the Project will modify certain travel paths for traffic entering and exiting the LAX CTA, compared to the approved LAMP Phase 1 roadway system. In some cases, the travel paths proposed for the Project are substantially longer than would exist under the LAMP Phase 1 plan yet the DEIR fails to account for these differences. Liddicoat calculated the increase in travel between various points at the airport under the LAMP and ATMP:

• From El Segundo to the CTA via Northbound Sepulveda Boulevard: GCTC estimates that the proposed ATMP routing will add roughly 3,900 feet (0.74 mile) to the travel distance for drivers.
• From the CTA to El Segundo via Southbound Sepulveda Boulevard: The travel distance following the loop would add about 5,000 feet (almost 0.95 mile).
• CTA Upper Level Loop to Southbound Sepulveda Boulevard: Use of that loop ramp, which is approximately 1,700 feet (0.32 mile) long, would not be necessary under the LAMP Phase 1 scheme.
• From Southbound Sepulveda Boulevard to the CTA: GCTC estimates the length of this out-of-direction travel at about 3,200 feet (0.61 mile).
• From the CTA to Northbound Sepulveda Boulevard: The additional travel distance on the proposed Project road system is estimated at 1,220 feet (0.23 mile), compared to the LAMP Phase 1 system. See Liddicoat Report at pp. 2 through 7.

As shown above, the Project's proposed roadway changes would cause substantially greater travel time and distance compared to the LAMP which will equate to an increase in VMT compared to the LAMP. In particular, Liddicoat calculated the increase in VMT attributable to the Project's roadway system modifications identified in the above bullet

points (79,960) and compared that figure to the DEIR's estimated increase in Passenger VMT (32,786). See Liddicoat Report at pp. 5 through 7.

Response: The content of this comment is substantively the same as comment ATMP-AL010-227; please refer to Response to Comment ATMP-AL010-227.

ATMP-AL010-109

Comment: In addition to the DEIR's failure to acknowledge the increase VMT resulting from the change in travel paths, the DEIR fails to acknowledge that the Project would erode certain of the trip reduction benefits of the LAMP, thereby further increasing VMT. Specifically, the LAMP was intended to encourage transit ridership at LAX. Yet, as the Liddicoat Report explains, the DEIR touts the ability of the ATMP to "improve overall access to and from the CTA" (DEIR at p. 2-39), "reduc[e] traffic congestion on Sepulveda Boulevard" (DEIR at p. 2-39), and "help keep airport-related traffic congestion and back-up off public streets" (DEIR at p. 2-10). These roadway improvements would have the effect of improving the attractiveness of LAX for both airlines and passengers and would clearly result in additional vehicular traffic and VMT. See Liddicoat Report at p. 10.

Response: The commenter presents a series of citations from the Draft EIR related to roadway improvements and asserts that these improvements would improve the attractiveness of LAX for both airlines and passengers. Please see Topical Response TR-ATMP-G-1 for information regarding the factors influencing airline schedules and passenger demand. As discussed in TR-ATMP-G-1, reduced traffic congestion in the CTA or in the vicinity of LAX would not be a determinative factor in airlines scheduling more flights or scheduling larger aircraft at LAX to accommodate any theoretical additional demand for air travel resulting from less traffic congestion at or around LAX. As discussed in TR-ATMP-G-1, passengers choosing whether to fly and which airport to use are primarily motivated by airport destination options, flight frequency, and price. Therefore, contrary to the commenter's assertion, the proposed Project improvements would not result in additional passenger-related vehicular traffic, compared to the No Project scenario. As discussed in Section 4.8 of the Draft EIR, implementation of the proposed Project would result in more passenger-related VMT than would occur under the Projected Future Conditions Baseline; however, that increase is attributable to the approximately 5.8 lane miles of additional roadway that would occur from development of the proposed roadway system improvement and to the addition of the Terminal 9 parking facility. It is not due to any change in the number of passenger trips associated with the proposed Project compared to the Projected Future Conditions Baseline. Moreover, contrary to the commenter's assertion that "the Project would erode certain of the trip reduction benefits of the LAMP," the Project would expand the previously-approved Automated People Mover (APM) system to the proposed Terminal 9, improving access to the Central Terminal Area and encouraging transit ridership (see Section 2.3.1.1.3 of the Draft EIR.)

The commenter refers to a letter prepared by Griffin Cove Transportation Consulting, PLLC, which was provided by the commenter as Attachment C to their comment letter. Please see Response to Comment ATMP-AL010-244 for the response to the commenter's citation.

ATMP-AL010-110

Comment: The revised EIR must be revised to provide accurate VMT estimates. As the VMT estimates are used to calculate air quality and greenhouse gas emissions, the revised DEIR must recalculate these emissions as well.

Response: Please see Responses to Comments ATMP-AL010-227 (which addresses the issues raised in comment ATMP-AL010-108), and ATMP-AL010-109 for a discussion of the accuracy of the VMT estimates used in the Draft EIR. As discussed in those responses, the VMT estimates used in the Draft EIR transportation analysis, which, in turn, were used to calculate air quality and greenhouse gas emissions, were accurate. Therefore, no revisions to the VMT estimates used in the Draft EIR are required.

In preparing the Final EIR for the proposed Project, LAWA has reviewed all of the comments received, including the responses to the comments identified above, and has carefully considered the responses to these comments and other information provided in the LAX Airfield and Terminal Modernization Project Final EIR. None of the information provided in the Final EIR meets the criteria for preparation and recirculation of a revised EIR as outlined in Section 15088.5 of the State CEQA Guidelines.

ATMP-AL010-111

Comment: (b) The DEIR Lacks Evidentiary Support that the Mitigation Measure (ATMP)-1 VMT Reduction Program Would Effectively Reduce the ATMP's VMT-related Impacts.

The DEIR determines that the trip reduction strategies included in MM-T (ATMP)-1 VMT Reduction Program would reduce the Project's increase in Employee-related VMT to a less than significant level. DEIR at pp. 4.8-54, 4.8-57. The DEIR also relies on this same mitigation measure to reduce the increase in Passenger VMT and Induced VMT. While certain of the strategies identified in this measure might result in some level of trip reduction, the measure does not provide the necessary concrete steps ensuring that specific trip reduction will be achieved. Consequently, the DEIR lacks the required substantial evidence that MM-T (ATMP)-1 would reduce the Project's Employee-related VMT impacts to a less than significant level.

Response: Please see Topical Response TR-ATMP-T-2 regarding VMT mitigation measures and monitoring for the LAX Airfield and Terminal Modernization Project. As indicated therein, the effectiveness of MM-T (ATMP)-1, VMT Reduction Program, is quantified in the EIR based on published research and shows that airport-wide employment VMT is anticipated to be reduced by more than 16,450 daily VMT. Further, the actual effectiveness of the VMT reduction strategies selected for implementation would be validated through annual monitoring and reporting. If other feasible VMT reduction strategies are identified in the future and are needed to reduce the VMT impacts below the level of significance as indicated through mitigation monitoring, they, too, may be implemented.

ATMP-AL010-112

Comment: One of the strategies in MM-T (ATMP)-1 is the expansion of LAWA's existing rideshare program. DEIR at p. 4.8-52. The measure states that LAWA has an opportunity to increase the frequency and diversify the format of trip-reduction marketing and promotions to LAWA employees but it does not describe LAWA's existing trip-reduction marketing and promotions so it is not possible to determine how an increase in frequency or a diversification of such a program would result in increased trip reduction. Uncertain, vague, and speculative mitigation measures have been held inadequate because they lack a commitment to enforcement. See, e.g., *Anderson First Coalition v. City of Anderson* (2005) 130 Cal.App.4th 1173, 1188-89 (holding traffic mitigation fee measure inadequate under CEQA due to vagueness in program for implementing required improvements).

Response: The commenter is incorrect that the VMT reduction strategies included in MM-T (ATMP)-1, VMT Reduction Program, are uncertain, vague, or speculative. Please see Topical Response TR-ATMP-T-2 regarding VMT mitigation measures and monitoring for the LAX Airfield and Terminal Modernization Project. As indicated therein, the VMT reduction strategies are described in the Draft EIR and the anticipated effectiveness of the VMT reduction strategies is reported in the Draft EIR based on published research. The actual effectiveness of the VMT reduction strategies selected by LAWA for implementation would be validated through annual monitoring and reporting. If other feasible VMT reduction strategies are identified in the future and are needed to reduce the VMT impacts below the level of significance as indicated through mitigation monitoring, they too may be implemented.

The commenter states that there is insufficient information regarding LAWA's existing Rideshare program, or the manner in which that program would be expanded to reduce employee VMT.

The LAWA Rideshare Program has over 700 participants, which is around 20 percent of LAWA employees, and over the past 16 years LAWA has met its South Coast Air Quality Management District goal of 1.5 riders per vehicle during peak commute hours. LAWA markets and promotes the Program in several ways, including, but not limited to, presenting it at New Employee Orientation, hosting or participating in Bike to Work Week, Rideshare Week, and Clean Air Day events, LAWA also promotes the Program at the annual Employee Appreciation Day Fair and at educational fairs onsite. LAWA also does targeted outreach to employees when new programs such as Iride and Metro Micro launch.

As noted in Topical Response TR-ATMP-T-2, in light of comments received on the Draft EIR, certain clarifications have been made to the description of potential VMT reduction strategies included in Section 4.8.5.2.2 of the Draft EIR, including as related to the fact that LAWA's Rideshare Program encompasses many features in addition to vanpools. Please see Chapter F3, Corrections and Clarifications to the Draft EIR, regarding incorporation of these changes into the Final EIR. These clarifications do not require any changes to the transportation analysis and do not alter the results or conclusions of the transportation analysis.

ATMP-AL010-113

Comment: In addition, while MM-T (ATMP)-1 calls for LAWA to provide enhanced commuter incentives, including transit subsidies (DEIR at p. 4.8-55), these references are also excessively vague and therefore unenforceable. The DEIR does not describe LAWA's existing commuter benefit program and does not describe how commuter incentives and carpool benefits would be expanded. This measure could be strengthened—and made enforceable—by requiring that LAWA offer financial incentives for its employees similar to the program the City of San Francisco requires of its businesses. San Francisco's Commuter Benefits Ordinance requires businesses to offer transportation benefits (e.g., a monthly pre-tax deduction, up to $265/month, to pay for transit or vanpool expenses) that provides financial incentives to encourage employees to bike, take transit and carpool to work. City of San Francisco Commuter Benefit Ordinance.[51]

[51] Available at https://sfenvironment.org/commuter-benefits-ordinance-sf; last accessed Feb. 9, 2021.

Response: The commenter is incorrect that the incentives and commuter benefits included as VMT reduction strategies in MM-T (ATMP)-1, VMT Reduction Program, are vague and therefore unenforceable. As indicated in Section 4.8.5.2.2 of the Draft EIR, the expanded incentives and commuter benefits for LAWA employees and other LAX employers are included as additional strategies that could be implemented by LAWA to reduce VMT. The Draft EIR identifies the specific, quantifiable target that the program must achieve in order to avoid a significant impact with respect to employee VMT. The target is neither vague nor unenforceable. The list of additional strategies included in the Draft EIR was not used to calculate the anticipated reduction in airport-wide employment VMT of more than 16,450 daily VMT. Rather, the list of strategies serves as a menu of approaches that can be used in order to achieve the identified target. Because the employee incentives and benefits proposal is one of several strategies on this menu, it is not necessary to identify the specific level of incentives or benefits that would be provided. Rather, the commitment is to achieve the identified reduction in employee VMT, and the employee incentive/benefit is one of several means of attaining it. Providing additional details regarding how this strategy would be implemented at this time would not change the conclusion of the Draft EIR. LAX is committed to reducing employee VMT, as described on pages 4.8-56 and 4.8-57 of the Draft EIR, and the annual monitoring reports prepared once either Concourse 0 or Terminal 9 becomes operational will include a full list and description of the incentives and commuter benefits that were offered in the preceding year and the VMT per employee. Please see Topical Response TR-ATMP-T-2 for further discussion.

ATMP-AL010-114

Comment: Other strategies included in MM-T (ATMP)-1, while potentially promising, are similarly vague and therefore unenforceable. For example, the DEIR calls for conducting a parking study to price parking to reduce VMT. DEIR at p. 4.8-54. Increasing the price of parking

is an effective method to reduce vehicular trips, yet the DEIR does nothing other than promise to study the issue. To be an effective mitigation measure, LAWA must commit to take action once the study is completed (e.g., LAWA could commit to increase the price of parking annually until it receives its targeted VMT reduction).

Response: The commenter is incorrect in stating that the other strategies to reduce VMT as part of MM-T (ATMP)-1 VMT Reduction Program included in the Draft EIR are vague and, therefore, unenforceable. Please see Topical Response TR-ATMP-T-2 regarding VMT mitigation measures and monitoring for the LAX Airfield and Terminal Modernization Project. As indicated therein, the parking pricing study is included as an additional strategy that could be implemented by LAWA; the study would determine the effectiveness of parking pricing as a means of further reducing VMT. The list of additional mitigation strategies in the Draft EIR could be implemented should future monitoring determine that the primary four mitigation strategies are not effective at reducing VMT to the levels stated in the Draft EIR, as measured through the mitigation monitoring program. LAWA agrees that parking pricing is sufficiently promising that it is worthy of consideration; that is why MM-T (ATMP)-1 VMT Reduction Program includes parking pricing as an available strategy. Insufficient data is available, however, to determine how effective this strategy would be in this setting where extensive parking resources exist nearby that are not controlled by LAWA. That is why this particular strategy is recommended for further study. If further study shows that this strategy is feasible and effective, then it will be implemented.

ATMP-AL010-115

Comment: Another strategy in MM-T (ATMP)-1 calls for LAWA to evaluate the potential for modifications to FlyAway bus service to reach new geographical areas. DEIR at p. 4.8-55. Here too, LAWA can and should do more. There is no reason why LAWA could not commit to take specific action upon completion of the study.

Response: Please see Topical Response TR-ATMP-T-2 regarding VMT mitigation measures and monitoring for the LAX Airfield and Terminal Modernization Project. The VMT reduction strategy regarding FlyAway Service as part of MM-T (ATMP)-1 is included as an additional strategy that could be implemented by LAWA. As stated on page 4.8-52 of the Draft EIR, prior to commencing operation of Concourse 0 or Terminal 9, LAWA would implement a VMT reduction program and then monitor its effectiveness annually thereafter.

ATMP-AL010-116

Comment: The DEIR cannot rely on this flawed mitigation measure to conclude that the Project's employee VMT impacts would be less than significant. Again, LAWA can and must do more. In addition to implementing enhanced commuter incentives, LAWA could expand the provision of its on-demand micro-transit shuttle to include the City of El Segundo. See DEIR at p. 4.8-53. Given the proximity of El Segundo to LAX, LAWA should offer shuttle service between El Segundo and the airport. This shuttle service should include

LAWA and LAX employees who live in El Segundo as well as El Segundo residents who travel to and from LAX.

Response: The content of this comment is similar to comment ATMP-AL010-229; please refer to Response to Comment ATMP-AL010-229.

ATMP-AL010-117

Comment: LAWA should also install bus stop improvements within El Segundo to facilitate travel between El Segundo and the airport. Currently, Metro's NextGen study eliminates bus stops on Imperial Highway. These changes are scheduled to go into effect in early 2021. The revised EIR should add the following mitigation measure: "To the extent that transit service is provided by either Metro or a different provider, LAWA will work with El Segundo to improve the transit stops that are active. The improvements will focus on the safety and convenience of transit users, especially those traveling to and from jobs located on the north side of Imperial Highway."

Response: Please see Topical Response TR-ATMP-T-2 regarding VMT mitigation measures and monitoring for the LAX Airfield and Terminal Modernization Project. The topical response addresses the additional VMT reduction strategies requested by the commenter from the City of El Segundo.

ATMP-AL010-118

Comment: 6. The DEIR Errs In Its Analysis of Freeway System Impacts.

As the Liddicoat Report explains, the DEIR ignores the Project's impacts on the freeway system, as the "freeway safety analysis" does nothing to address operational or safety conditions on the I-405 freeway mainline. Liddicoat Report at p. 12. On the other hand, the LAMP EIR examined 46 freeway segments in the vicinity of LAX. (i.e., each direction of 23 individual segments). Of those, 26 were found to operate at LOS E or F in the AM peak hour under 2035 Future with Project conditions. In the PM peak hour, 23 such segments were identified. Id. This suggests a need to evaluate the potential impacts of the ATMP on the freeway system serving LAX and surrounding jurisdictions.

Response: The content of this comment is substantively the same as comment ATMP-AL010-250; please refer to Response to Comment ATMP-AL010-250.

ATMP-AL010-119

Comment: The analysis of freeway operations should be revised to also address whether implementation of the ATMP would encourage drivers to use Sepulveda Boulevard/Pacific Coast Highway as an alternative to I-405. The revised EIR must disclose whether the ATMP would cause sufficient congestion on the freeway to divert drivers to

the nearby arterial roads. Such an analysis must consider the effects of the widespread use of cell phone apps (such as Waze, Google Maps, and others) and in-car navigation systems, which often encourage drivers to divert to alternative routes.

Response: The content of this comment is substantively the same as comment ATMP-AL010-251; please refer to Response to Comment ATMP-AL010-251.

ATMP-AL010-120

Comment: Liddicoat uncovered several additional flaws in the DEIR's freeway impact analysis. First, the DEIR determines that the Project would cause only one freeway off-ramp serving LAX to have 25 or more peak-hour trips. As the Liddicoat Report explains, this low volume of traffic appears highly unrealistic. A review of LAWA's November 2019 Traffic Generation Report reveals that in the peak month (i.e., August) an average of 5,202 vehicles entered the CTA in the AM peak hour and 4,909 did so in the PM peak hour. See Liddicoat Report at p. 15: "While we recognize that not all of the off-ramp left turns are bound for the CTA, we believe this provides a reasonable indication that the estimated ATMP Project volumes are not valid, as they appear to understate the volume of ATMP Project generated traffic at the off-ramp."

Response: Please see Response to Comment ATMP-AL010-253 which addresses the selection of freeway off-ramps. Please see Response to Comment ATMP-AL010-257 regarding the comment on traffic volumes generated at the off-ramp.

ATMP-AL010-121

Comment: Second, the DEIR assumes that at the Century Boulevard off-ramp from I-405 northbound, traffic volumes in the 2028 Baseline scenario are 90-95 percent lower than the Existing volumes. See Liddicoat Report at p. 15. Specifically, in the AM peak hour, the northbound right-turn volume is shown to decline from 308 existing vehicles to 14 vehicles in the 2028 Baseline scenario, a reduction of 294 vehicles. In the PM peak hour, that right-turn movement is reduced from 394 vehicles (existing) to 38 vehicles (2028 Baseline), a difference of 356 vehicles. The 2028 Baseline Plus Project scenario's right-turn volumes are even lower than the 2028 Baseline volumes, improbably suggesting that implementation of the Project would cause a reduction in traffic on that movement. Id. The only possible explanation for the reduction from Existing to 2028 Baseline conditions is that a significant roadway system modification is assumed that would divert traffic away from the northbound off-ramp, yet no such modification is described in the DEIR. Beyond this, it is difficult to imagine why addition of the Project traffic would result in a further reduction in the off-ramp volumes. Id.

Response: Please see Response to Comment ATMP-AL010-255 concerning the northbound right-turn off-ramp volumes. The freeway queuing safety analysis has been corrected and revised results are presented in that response and in Chapter F3, Corrections and Clarifications to the Draft EIR. The revised queuing analysis presented in the corrections

to the Draft EIR results in the same conclusion previously documented in the circulated Draft EIR (i.e., no significant impact).

ATMP-AL010-122

Comment: The Liddicoat Report states that it is also difficult to understand why the northbound I-405 on-ramp volumes (i.e., eastbound right-turn) are unchanged in either the 2028 Baseline or Baseline Plus Project scenarios. Substantial growth is projected on the eastbound and westbound thru movements at this intersection. There is simply no rational explanation for these anomalies. Liddicoat Report at p. 15.

Response: Please see Response to Comment ATMP-AL010-256 regarding the eastbound right-turn volume. The freeway queuing safety analysis has been corrected and revised results are presented in Response to Comment ATMP-AL010-255 and Chapter F3, Corrections and Clarifications to the Draft EIR. The revised queuing analysis presented in the corrections to the Draft EIR results in the same conclusion previously documented in the circulated Draft EIR (i.e., no significant impact).

ATMP-AL010-123

Comment: Third, although the DEIR does not discuss it, the Liddicoat Report explains that the queue length analysis worksheets reveal substantial operational deficiencies on Century Boulevard. Liddicoat Report at p. 15. In particular, the queue on the westbound Century Boulevard thru movement at the I-405 Northbound Off-ramp/Century Boulevard intersection is projected to be 662 feet (27 vehicles) long in the AM peak hour under 2028 Baseline Plus Project conditions. In the PM peak hour, that queue would be 309 feet (13 vehicles) long. However, only approximately 200 feet exist between the subject intersection and the next intersection to the east (Century Boulevard/Felton Avenue). Thus, in both peak-hour periods, the Felton Avenue intersection would be blocked by westbound vehicles on Century Boulevard, as would several driveways serving private properties. Id. More importantly, perhaps, given the freeway-related intent of the analysis, the eastbound thru queue in the PM peak hour at this intersection would be 652 feet (27 vehicles) long, which would be sufficient to block access to the I-405 northbound on-ramp. As Liddicoat opines, perhaps this is the reason for the illogical lack of growth in the I-405 on-ramp traffic, as described above. Liddicoat Report at p. 15.

Response: The content of this comment is substantively the same as comment ATMP-AL010-259; please refer to Response to Comment ATMP-AL010-259.

ATMP-AL010-124

Comment: Moreover, the Liddicoat Report determined that more than 600-foot queue length estimates are shown on the analysis worksheet with a footnote stating, “95th percentile volume exceeds capacity, queue may be longer.” Thus, the situation might well be worse

than described here, with even greater traffic obstructions prevailing. Liddicoat Report at p. 16.

Response: The content of this comment is substantively the same as comment ATMP-AL010-260; please refer to Response to Comment ATMP-AL010-260.

ATMP-AL010-125

Comment: In sum, the DEIR's "freeway safety analysis" is highly flawed, to the point where, according to Liddicoat, the results are simply not credible. Liddicoat Report at p. 16. The revised EIR must correct this deficient analysis.

Response: This comment is provided as a conclusion to Section V.C.6 of the comment letter, which is identified as comments ATMP-AL010-118 through ATMP-AL010-124 for purposes of this Final EIR. For responses to the comments regarding the adequacy of the Draft EIR's freeway safety analysis included in comments ATMP-AL010-118 through ATMP-AL010-124 above, please see Responses to Comments ATMP-AL010-250, ATMP-AL010-251, ATMP-AL010-253, ATMP-AL010-255 through ATMP-AL010-257, ATMP-AL010-259, and ATMP-AL010-260. As discussed in these responses, the freeway safety analysis was completed in accordance with the City of Los Angeles Transportation Assessment Guidelines. The transportation analysis also considered cell phone probe data ("Big Data") to fine tune route information (including congestion and vehicle speeds), thereby considering possible effects on arterial roads and during peak hours. The intersection of northbound I-405 offramp and Century Boulevard was specifically analyzed and no significant freeway safety impacts, including those associated with queuing lengths, were identified. However, corrections were made to the freeway queuing safety analysis, which are presented in Chapter F3, Corrections and Clarifications to the Draft EIR.

Please also see Topical Response TR-ATMP-T-1 regarding the assessment of transportation effects associated with the proposed Project that are not subject to CEQA.

ATMP-AL010-126

Comment: 7. The DEIR Fails to Adequately Analyze Impacts Pertaining to Vehicular Access to Terminal 9 and These Impacts Would Appear to Be Significant.

Vehicles traveling to the proposed Terminal 9 and its parking structure from northbound Sepulveda Boulevard would pass through a new traffic-signal-controlled intersection on Century Boulevard at the proposed new "A" Street. See Liddicoat Report at p. 13. Traffic from northbound Sepulveda Boulevard to eastbound Century Boulevard would pass though this same intersection, as would eastbound traffic departing the CTA. The DEIR provides no information regarding traffic operations at this location.

Response: The content of this comment is substantively the same as comment ATMP-AL010-231; please refer to Response to Comment ATMP-AL010-231.

ATMP-AL010-127

Comment: Congestion at this location has the potential to cause vehicular queues on the eastbound intersection approach to back up onto northbound Sepulveda Boulevard and even into the Sepulveda Tunnel. In order to evaluate these potential impacts, the revised EIR must respond to the following questions:

• Upon completion of the Project and occupancy of Terminal 9 and its parking structure, how long would eastbound vehicular queues extend from the traffic signal-controlled intersection referenced above?

Response: The content of this comment is substantively the same as comments ATMP-AL010-128 to ATMP-AL010-130 and ATMP-AL010-231 to ATMP-AL010-234. Please see Topical Response TR-ATMP-T-1 regarding the assessment of transportation effects associated with the LAX Airfield and Terminal Modernization Project that are not subject to CEQA, which was conducted in accordance with the City of Los Angeles Transportation Assessment Guidelines. As indicated therein, traffic operations analysis such as level of service (LOS) is no longer used as a basis for determining significant transportation impacts under CEQA.

However, to address the comment on queue length at this location along with the subsequent assertions (in the comments listed above) that there may be issues related to safety and collisions, a queueing analysis was prepared as part of the LADOT Non-CEQA transportation report. The results of this queue length analysis are presented in the table below:

Intersection	Time Period	Storage Capacity (feet)	Future with Project 95 Percentile Queue Length (feet)	Exceeds Storage Capacity (Yes or No)
Century Boulevard & Jetway Boulevard eastbound approach	AM	*800*	377	No
	PM	*800*	461	No

The proposed connecting road from northbound Sepulveda Boulevard would provide access to both eastbound Century Boulevard and Terminal 9. There would be about 1,650 feet storage capacity from the gore point where the connecting road would diverge from northbound Sepulveda Boulevard to the intersection of Jetway Boulevard and Century Boulevard. Of this, approximately 850 feet would be on the connecting road itself. The distance from where this road would join the roadway carrying outbound traffic from the CTA to the intersection of Century Boulevard and Jetway Boulevard is approximately 800 feet long. The Synchro intersection queue analysis shows that the queues in the AM and PM peak hours would be 377 and 461 feet, respectively. Therefore, this would not exceed the storage space available during these time periods

and hence vehicles would not be expected to back up onto Sepulveda Boulevard. In addition, the new connecting road from Sepulveda Boulevard to the Century Boulevard and Jetway Boulevard intersection would be designed to the applicable Caltrans and City of Los Angeles design standards. Therefore, this new connecting road is not expected to result in a safety issue.

ATMP-AL010-128

Comment: • Would the queues extend into the Sepulveda Tunnel?

Response: The content of this comment is similar to comment ATMP-AL010-127; please refer to Response to Comment ATMP-AL010-127. As noted in that response, please see Topical Response TR-ATMP-T-1 regarding the assessment of transportation effects associated with the LAX Airfield and Terminal Modernization Project that are not subject to CEQA, which was conducted in accordance with the City of Los Angeles Transportation Assessment Guidelines. As indicated in therein, traffic operations analysis such as level of service (LOS) is no longer used as a basis for determining significant transportation impacts under CEQA.

ATMP-AL010-129

Comment: • Would the queues extend onto northbound Sepulveda Boulevard/Pacific Coast Highway?

Response: The content of this comment is similar to comment ATMP-AL010-127; please refer to Response to Comment ATMP-AL010-127. As noted in that response, please see Topical Response TR-ATMP-T-1 regarding the assessment of transportation effects associated with the LAX Airfield and Terminal Modernization Project that are not subject to CEQA, which was conducted in accordance with the City of Los Angeles Transportation Assessment Guidelines. As indicated in therein, traffic operations analysis such as level of service (LOS) is no longer used as a basis for determining significant transportation impacts under CEQA.

ATMP-AL010-130

Comment: • What are the safety impacts on Sepulveda Boulevard/Pacific Coast Highway, particularly with regard to increased collisions due to development of Terminal 9 and its associated traffic?

Response: Please refer to Response to Comment ATMP-AL010-127 which addresses the issue regarding collisions in this comment.

ATMP-AL010-131

Comment: Moreover, LAWA indicates that temporary access to Terminal 9 would be provided via direct ramps from northbound Sepulveda Boulevard while the Project improvements are being constructed. Two ramps are proposed, one to the arrivals level and one to the departure level.

• How long would vehicular queues on the inbound ramps (from northbound Sepulveda Boulevard/Pacific Coast Highway to Terminal 9) be?

• Would these queues exceed the lengths of the temporary ramps, thereby extending onto northbound Sepulveda Boulevard and creating a safety issue, particularly with regard to increased rear-end collisions?

Response: The content of this comment is substantively the same as comment ATMP-AL010-235; please refer to Response to Comment ATMP-AL010-235.

ATMP-AL010-132

Comment: In addition to providing answers to the aforementioned questions, the revised DEIR should explain whether LAWA considered other alternatives for vehicular access to/from Terminal 9, specifically with respect to traffic approaching/departing via Sepulveda Boulevard/Pacific Coast Highway in or through El Segundo. If such alternatives were not evaluated, given the potential for significant impacts from this access approach to Terminal 9, the revised EIR should consider redesigning the Project to avoid direct access to Terminal 9 from Sepulveda Boulevard, i.e., all vehicle access for Terminal 9 to and from Sepulveda Boulevard should use the same Sepulveda Boulevard on and off ramps as are used for CTA access. This would likely require that all of the LAMP roadway improvements (including as modified by the Project) would be completed prior to opening Terminal 9 so that there is no temporary or permanent direct vehicle access to Terminal 9 from Sepulveda.

Response: The content of this comment is similar to comment ATMP-AL010-236; please refer to Response to Comment ATMP-AL010-236.

ATMP-AL010-133

Comment: 8. The DEIR Omits an Analysis of the Project's Construction-related Transportation Impacts.

The DEIR fails to analyze the Project's construction-related transportation impacts. Given the proximity of El Segundo to LAX, along with the size of the Project and its lengthy construction schedule, these impacts to the City are likely to be extensive. We can find no logical explanation as to why the DEIR entirely ignores how construction of the Project would affect El Segundo roads and intersections.

As the Liddicoat Report explains, EIRs typically address the transportation-related impacts that will occur during a project's construction period. Liddicoat Report at p. 8. These analyses generally provide an estimate of the amount of construction-related traffic that will occur, in terms of construction worker commute trips as well as various forms of truck trips (goods/material deliveries, haul trips, etc.). Indeed, the LAMP EIR contained a highly-detailed construction traffic analysis, which encompassed 52 pages. That EIR determined that such impacts were significant and unavoidable. LAMP DEIR at p. 1-20.

Response: The transportation impacts analysis presented in the Draft EIR for the proposed Project was prepared in accordance with the current requirements of the State CEQA Guidelines and the City of Los Angeles Department of Transportation's (LADOT's) Transportation Assessment Guidelines. The commenter asserts below in comment ATMP-AL010-35 that "[h]ad the DEIR conducted the necessary analysis, it would have undoubtably determined that the Project's construction-related transportation impacts would be significant, thus triggering the requirement for mitigation" and then goes on to cite the "Liddicoat Report at p.8." as the basis for that claim. Although page 8 of the Liddicoat Report makes no mention of construction impacts, the discussion on page 9 of the Liddicoat Report lays out the outdated approach to addressing construction-related traffic impacts that was typically used prior to the key change to the State CEQA Guidelines that occurred in December 2018 (i.e., the shift away from congestion-related analyses over to vehicle miles traveled [VMT] analyses). The Liddicoat Report states that Draft EIRs typically address the transportation-related impacts that will occur during the proposed Project's construction period, and such analyses generally provide an estimate of the amount of construction-related traffic relative to worker commute and truck trips (see comment ATMP-AL010-237). Such information and analyses relate to the past practice of evaluating traffic congestion, delays, and "Level of Service" (LOS). As described in Section 4.8.1 of the Draft EIR, which is the introduction to the transportation impacts analysis completed for the proposed Project, the State no longer considers automobile delay, as described solely by LOS or similar measures of vehicular capacity or traffic congestion, to be a significant impact on the environment under CEQA. Instead the evaluation of VMT is now the required approach for transportation impacts under CEQA statewide. In accordance with the amended State CEQA Guidelines, the LADOT revised their transportation assessment requirements for CEQA documents to no longer address a project's impacts in terms of LOS, but rather with respect to VMT. It should be noted that in Caltrans' comment letter on the Draft EIR, they agreed with the VMT analysis approach and conclusions presented in the Draft EIR (see Comment ATMP-AS001-8). The Liddicoat Report notes the transportation impacts analysis completed for the LAX Landside Access Modernization Program EIR addressed construction-related transportation impacts in a manner similar to that being promoted by Liddicoat; however, that EIR, including the transportation impacts analysis, was completed prior to the aforementioned changes to the State CEQA Guidelines (i.e., the LAX Landside Access Modernization Program Draft EIR was completed in September 2016 and the LAX Landside Access Modernization Program Final EIR was completed in February 2017). In summary, the transportation impacts analysis for the proposed Project, and the resultant conclusions of that analysis, were completed in accordance with current State and local requirements, whereas an analysis of the Project's contribution to traffic congestion and/or delay on roadway segments and intersections, as proposed by the

commenter, would not be meaningful because such congestion and delay are not environmental impacts under CEQA.

ATMP-AL010-134

Comment: Although the ATMP DEIR includes a cursory discussion of construction phasing, staging, contractor parking, and haul routes (DEIR at p. 2-77), the document lacks substantive detail and is therefore meaningless. For example, the DEIR states that, "employee contractor parking for the proposed Project would be located adjacent to or within the construction sites for the proposed facilities" and "[c]onstruction employees could be shuttled between construction sites and construction employee staging/parking areas, if/as warranted." DEIR at p. 2-78. However, the DEIR provides no further detail. Moreover, use of unenforceable words and phrases such as "could" and "if/as warranted" provides no assurance that such measures will actually be implemented. While the DEIR does explain that LAWA intends to eventually identify construction haul routes and that it will prepare a Site Logistics Plan that will be submitted to the LAX Coordination and Logistics Management ("CALM") Team (DEIR at p. 2-82), it contains no rationale for why this important information is not included in the DEIR.

Response: Section 2.6, Construction, of the Draft EIR provides information on construction phasing, staging, contractor parking, and haul routes appropriate for the conceptual level of planning that is currently available for the proposed Project. Additional information would be developed in conjunction with preparation of more detailed plans for the construction of the individual elements of the proposed Project. The more detailed construction information for proposed Project improvements would be coordinated with the construction programs of other LAX projects that would be underway at the same time. Such coordination, including coordination of the Site Logistics Plans of the various projects with concurrent construction activities, is done through the LAX Coordination and Logistics Management (CALM) Team. That process of coordinating and managing the logistics of multiple concurrent construction projects has been used consistently and successfully for more than 10 years at LAX, including for major projects such as, but not limited to, the Bradley West Gates project, the Tom Bradley International Terminal Rehabilitation project, the Midfield Satellite Concourse – North Concourse project, the West Airfield Maintenance Area project, numerous runway and taxiway improvements/rehabilitation projects, the LAWA Airport Police Facility project, the Consolidated Rental Car Facility project, the Automated People Mover (APM) System project including the related APM stations/vertical cores within the Central Terminal Area, and the Intermodal Transportation Facility – West project.

The commenter asks for a level of detail that cannot feasibly be provided for a complex, multi-phase construction project spanning over a period of years. Based on LAWA's experience with other construction projects, the appropriate approach is to establish a framework such that construction-related logistics are addressed in a comprehensive, continuous manner throughout the construction period. The LAX CALM Team provides such a framework.

ATMP-AL010-135

Comment: Had the DEIR conducted the necessary analysis, it would have undoubtedly determined that the Project's construction-related transportation impacts would be significant, thus triggering the requirement for mitigation. See Liddicoat Report at p. 8.

Response: The content of this comment is essentially the same as comment ATMP-AL010-133; please refer to Response to Comment ATMP-AL010-133.

ATMP-AL010-136

Comment: Consequently, LAWA should adopt the following mitigation measures to reduce these impacts.

First, LAWA should cooperate with El Segundo as follows to reduce airport-related traffic congestion on City streets during ATMP construction:

• LAWA will develop and maintain a public information website re: Project status, scheduled lane closures, and other ATMP construction-related traffic impacts.

• LAWA will cooperate with El Segundo staff to provide residents with advance notice of ATMP construction-related lane closures and traffic impacts.

Response: The commenter is requesting a number of measures suggested as mitigation for what the commenter believes would be significant construction-related traffic impacts associated with the proposed Project. That belief is based on an impacts analysis construct that is now outdated and no longer consistent with state and local requirements for CEQA documents. Please see Response to Comment ATMP-AL010-133 for additional discussion regarding that issue.

LAWA maintains an extensive public notification program regarding construction activities underway at LAX including, but not limited to, construction advisories for any upcoming roadway closures or detours disseminated via email and posted on public websites, targeted stakeholder meetings to provide in-depth information on major work in and around an impacted area, frequent stakeholder presentations on project status, quarterly newsletters, and periodic (i.e., quarterly or semi-annually) stakeholder meetings to discuss construction activities, particularly as related to roadway impacts. Additionally, on major construction projects at LAX, LAWA provides a website with extensive information about the project, including construction activities – see, for example, the LAX Landside Access Modernization Program website at https://www.lawa.org/connectinglax. Such a website would also be provided for the LAX Airfield and Terminal Modernization Project. LAWA is currently developing a website that will consolidate construction and project information for all major projects at LAX within a single website, providing links to the individual projects. It is anticipated that the consolidated construction projects website will be on-line later this year (2021). In summary, LAWA implements several different means of providing the communities and

stakeholders around LAX with updates and notifications regarding construction activities at the airport. In addition to such construction-related information and notifications being available on LAWA's website, which can be accessed by the City of El Segundo, LAWA will invite the City of El Segundo to stakeholder meetings pertaining to the proposed Project.

ATMP-AL010-137

Comment: • LAWA will cooperate with El Segundo staff to evaluate and implement potential modification of timing of traffic signals in El Segundo to address ATMP construction-related traffic impacts.

Response: This comment is one of several requesting certain measures as mitigation for what the commenter believes would be significant construction-related traffic impacts associated with the proposed Project. That belief is based on an impacts analysis construct that is now outdated and no longer consistent with state and local requirements for CEQA documents. Please see Response to Comment ATMP-AL010-133 for additional discussion regarding that claim. As such, the suggested mitigation measure is not warranted. Notwithstanding, modifications to signals or signal timing in El Segundo is within the authority of the City of El Segundo, in coordination with Caltrans for signals along Sepulveda Boulevard (i.e., State Highway 1), which is not within the jurisdiction of LAWA.

ATMP-AL010-138

Comment: • LAWA will reimburse documented El Segundo costs for addressing ATMP construction-related impacts (e.g., police dispatched to intersections due to severe traffic backup from lane closures).

Response: This comment is one of several requesting certain measures as mitigation for what the commenter believes would be significant construction-related traffic impacts associated with the proposed Project. That belief is based on an impacts analysis construct that is now outdated and no longer consistent with state and local requirements for CEQA documents. Please see Response to Comment ATMP-AL010-133 for additional discussion regarding that claim.

As set forth in Response to Comment ATMP-AL010-239, LAWA has considerable experience managing construction-related traffic so that congestion does not occur on neighboring streets. LAWA anticipates that such concerns can be addressed here as well. It should be noted that, to the extent additional costs occurred by the commenter or others as a result of traffic management or the like, the potential for such costs is not an environmental impact for purposes of CEQA.

It should also be noted that construction of the proposed Project improvements does not require any construction activity in the City of El Segundo.

ATMP-AL010-139

Comment: Second, LAWA should commit to involve El Segundo as a stakeholder when it selects final construction staging sites, contractor parking locations, and haul routes. The City should be included as a participant in the CALM Team meetings when issues relevant to El Segundo are discussed. The CALM Team should also include a qualified traffic engineer (licensed by the State of California as a Civil or Traffic Engineer) acceptable to the City of El Segundo, who would be responsible for monitoring construction-related traffic congestion and would have the authority to recommend timing plan changes for traffic signals within El Segundo and surrounding areas, when necessary.

Response: This comment is one of several requesting certain measures as mitigation for what the commenter believes would be significant construction-related traffic impacts associated with the proposed Project. That belief is based on an impacts analysis construct that is now outdated and no longer consistent with state and local requirements for CEQA documents. Please see Response to Comment ATMP-AL010-133 for additional discussion regarding that claim. Please also see Response to Comment ATMP-AL010-136 regarding the construction activity notification measures that LAWA currently implements and will continue to do during development of the proposed Project, which is available to El Segundo.

ATMP-AL010-140

Comment: Third, pursuant to LAWA's sustainability policy, LAWA should commit to limiting the use of the west end of Imperial Highway as a haul route due to proximity to El Segundo residences. If the west end of Imperial Highway must be used as a haul route, LAWA should report this publicly and to El Segundo.

Response: Regarding LAWA's sustainability policy, LAWA has a Sustainable Design and Construction Policy and a Sustainability Action Plan. Both the Policy and the Plan are available at https://www.lawa.org/lawa-sustainability. Neither the Policy nor the Plan limits the use of the west end of Imperial Highway. Notwithstanding, no significant impacts are expected to occur from the periodic use of Imperial Highway as a construction haul route, which is shown on Figure 2-29 of the Draft EIR.

ATMP-AL010-141

Comment: Fourth, LAWA should undertake a process, in coordination with the City of El Segundo, to mitigate haul route pavement damage incurred as a result of the Project. This process would involve development of a baseline Pavement Condition Index ("PCI") for key roadways identified by El Segundo prior to initiation of construction work. See Liddicoat Report at p. 9. Following completion of the Project, the PCI evaluation process would be repeated, and LAWA would commit to undertaking any necessary pavement repairs, repaving, or roadway reconstruction, to the satisfaction of the City of El Segundo. During the course of the Project construction period, LAWA would also respond promptly to

City requests for evaluation of specific areas of concern regarding pavement conditions. Id.

Response: This comment is one of several requesting certain measures as mitigation for what the commenter believes would be significant construction-related traffic impacts associated with the proposed Project. That belief is based on an impacts analysis construct that is now outdated and no longer consistent with state and local requirements for CEQA documents. Please see Response to Comment ATMP-AL010-133 for additional discussion regarding that claim.

ATMP-AL010-142

Comment: D. The DEIR Fails to Adequately Analyze and Mitigate the Project's Air Quality Impacts.

LAX is located within the City of Los Angeles, a location which has the worst air quality—with the highest observed ozone concentrations—in the United States. "Nearly Half of U.S. Breathing Unhealthy Air; Record-breaking Air Pollution in Nine Western Cities," American Lung Association, April 21, 2020[52] According to air pollution consultant Todd Tamura with Tamura Environmental, LAX's NOx emissions comprise a sizeable amount of the emissions in the entire South Coast Air Basin.[53] See Tamura Report at p. 1 (stating that "[t]he 2018 annual NOx emissions from LAX are over half of the emissions of all 'point sources' (permitted industrial sources) in the entire [South Coast Air Basin], and are more than double the combined NOx emissions of all the petroleum refineries in the Wilmington/ Carson/West Long Beach area."). The DEIR confirms LAX's contribution to local and regional air pollution. See DEIR at p. 3-2 (stating "[t]he existing air quality setting in the immediate vicinity of the Project site is dominated by air pollutants from aircraft activities, including landings and take-offs, taxiing, and other aircraft movements; vehicles on airport roads and surrounding roads and highways; and industrial uses.").

[52] Available at https://www.lung.org/media/press-releases/state-of-the-air-2020; last accessed Feb. 9, 2021.
[53] Ozone forms as a result of volatile organic compounds ("VOCs") and NOx in the presence of sunlight. VOCs and NOx are termed "ozone precursors" and their emissions are regulated in order to control the creation of ozone. DEIR at p. 4.1.1-3

Response: As explained in the following responses, the Draft EIR's analysis of air quality impacts complies with CEQA.

The commenter compares LAX nitrogen oxide (NOx) emissions in 2018 to total stationary source emissions in the South Coast Air Basin and to stationary sources emissions from the petroleum refineries located in the Wilmington/Carson/Long Beach area. Most of the LAX NOx emissions come from mobile sources, primarily aircraft; thus, it would be more appropriate to compare LAX emissions to all mobile source NOx emissions in the South Coast Air Basin. The California Air Resources Board's California Emissions Projection Analysis Model (CEPAM) indicates that 2018 NOx emissions from all mobile

sources in the South Coast Air Basin totaled approximately 288 tons per day, of which LAX represents about 4.4 percent.

Section 4.1.1.3 in Section 4.1.1 of the Draft EIR discusses the existing air quality conditions in the region. As discussed in this section, the South Coast Air Basin is designated extreme nonattainment for the ozone National Ambient Air Quality Standards, as implied by the commenter. The methodology used to assess the proposed Project's air quality impact on existing air quality was documented in a protocol that was reviewed by the SCAQMD and the California Air Resources Board and is provided in Appendix C.8 of the Draft EIR. Furthermore, an extensive analysis of over 90 potential mitigation measures was completed and documented in Appendix C.9. The emissions calculations and air dispersion modeling completed for the Draft EIR, including the calculations of NOx emissions, are consistent with this air quality analysis protocol and quantify all feasible mitigation measures for which there was appropriate data available for analysis.

ATMP-AL010-143

Comment: These air pollutant emissions from aircraft activity at LAX contribute to adverse health effects for communities in the LAX vicinity. Wendy Gutschow, "Airport pollution linked to acute health effects among people with asthma in Los Angeles," USC Environmental Health Centers, February 14, 2019.[54]

[54] Available at https://envhealthcenters.usc.edu/2019/02/ultrafine-particle-pollution-lax.html; last accessed Feb. 9, 2021.

Response: The content of this comment is similar to comment ATMP-PC028-4; please refer to Response to Comment ATMP-PC028-4.

ATMP-AL010-144

Comment: In light of the severe air pollution in the Project study area, and the Project's potential to exacerbate that pollution, one would expect the DEIR to provide a comprehensive analysis of the Project's impacts and to thoroughly mitigate for these impacts. Yet, the DEIR fails to achieve CEQA's most basic purpose: informing governmental decisionmakers and the public about the potential significant environmental effects of a proposed activity. CEQA Guidelines § 15002(a)(1).

Response: As described in Response to Comment ATMP-AL010-142, the Draft EIR documented existing air quality. The Draft EIR provided a thorough and comprehensive analysis of the impacts of the proposed Project on air quality (see Section 4.1.1 and Appendix C of the Draft EIR). All significant environmental effects of the proposed Project were documented in the Draft EIR, as modified by Chapter F3, Corrections and Clarifications to the Draft EIR, of this Final EIR. Please also see Responses to Comments ATMP-AL010-

145 through ATMP-AL010-169 for detailed discussions of the air quality analysis that was provided in the Draft EIR.

ATMP-AL010-145

Comment: 1. The DEIR Does Not Accurately Reflect the Full Extent Of the Increase In Emissions That Would Result From The ATMP.

As discussed above, the DEIR repeatedly claims that the Project would have no growth effect on the passenger capacity of LAX because specific, quantified future "passenger activity . . . is anticipated to be realized with or without the proposed Project because the ability to accommodate the future aviation demand projected for LAX is not dependent on any of the improvements associated with the proposed Project." DEIR at p. 6-5; see generally DEIR, Appendix B.1. As a result, the DEIR determines that the air pollutant emissions associated with aircraft (takeoff, climb-out and landing) would be essentially the same in 2028 regardless of the Project. DEIR at p. 4.1.1-47. However, the DEIR reaches this determination because it assesses impacts only through the year 2028, immediately after the Project's construction would be completed, and before its impact on the airport's capacity would be realized.

The DEIR does compare the overall increase in airport emissions between 2018 and 2028 to CEQA's significance thresholds (and finds that the increases would be significant), but, again, the document assesses growth only during the construction period; it does not evaluate the impacts of the Project itself. This point is crucial. Although the DEIR asserts that the Project would result in a significant increase in NOx, PM10, PM2.5, and SOx, it is clear that the document actually attributes the increase in emissions between 2018 and 2028 to background growth. See DEIR at p. 4.1.1-45 (attributing the increases in NOx and SOx emissions to the increase in aircraft and APU activity in 2028 as compared to 2018, and the increase in PM10 and PM2.5 to increased VMT between 2018 and 2028).

Had the DEIR analyzed impacts beyond 2028, as CEQA requires, the Project's emissions would be far greater than the DEIR discloses. Clearly, the Airport will continue to operate—and the Project's effect on emissions will continue—well beyond 2028. As we have explained, passenger activity in the year 2045 is projected to be 127.9 MAP, which represents roughly a 50 percent increase over existing conditions and a 15 percent increase over the 2028 Baseline. Given these passenger activity estimates, it is highly unlikely that the greatest amount of Project-related emissions would be generated in 2028; rather it would occur at some point beyond that date. The DEIR's failure to recognize the Project's contribution to this growth and to disclose the associated environmental impacts both deprives the public and decisionmakers of information necessary to a full understanding of the Project's impacts, and divests the DEIR's significance conclusions of evidentiary support. CEQA requires lead agencies to use "best efforts" to estimate all "reasonably foreseeable" impacts. CEQA Guidelines §§ 15144, 15064(d).

Response: Please see Topical Response TR-ATMP-G-3 regarding the reasons why 2028 is the appropriate horizon year for evaluating the impacts of the proposed Project. Regarding

the Draft EIR's aviation forecast analysis, please see Section 2.3.1.2.2 and Appendix B.1 of the Draft EIR, as well as Topical Response TR-ATMP-G-1 for further discussion of the validity of this forecast.

ATMP-AL010-146

Comment: Finally, as Tamura points out, a comprehensive analysis of the Project's impacts is required by Federal General Conformity regulations. The analysis of a project's conformity with the State Implementation Plan is required to be based on the total of direct and indirect emissions from the action and must address the year during which the total of direct and indirect emissions from the action is expected to be greatest. 40 C.F.R. § 93.159(d). Tamura Report at p.4.

Response: The commenter notes that a General Conformity evaluation is required for the proposed Project, and that it should include the year during which the total of direct and indirect emissions from the action is expected to be the greatest on an annual basis. The Federal Aviation Administration (FAA), in coordination with LAWA, is in the process of preparing both a federal Environmental Assessment under the National Environmental Policy Act and a General Conformity Determination under the Clean Air Act, both of which are separate from the Draft EIR. Prior to initiating the General Conformity Determination, FAA developed and circulated an air quality impact analysis protocol to the South Coast Air Quality Management District, Southern California Association of Governments, California Air Resources Board, and U.S. Environmental Protection Agency. The responses to the agency comments were incorporated into the final protocol. The Draft General Conformity Determination, including the final protocol, was published in May 2021 for public review at the same time as the Draft Environmental Assessment and is available on LAWA's website at www.lawa.org/ATMP.

ATMP-AL010-147

Comment: 2. The DEIR Fails to Analyze the Health Impacts of Secondary Air Pollutants.

CEQA requires an EIR to discuss the specific human health effects that would occur as a result of a project's significant air pollutant emissions. *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 517-522. The DEIR determines that operations-related emissions between 2018 and 2028 would exceed thresholds established by SCAQMD and concludes that, even with mitigation, this would remain a significant and unavoidable impact. DEIR at pp. 4.1.1-43, 4.1.1-44. As Tamura explains, these operations-related NOx emissions increases are 46 times greater than the SCAQMD's thresholds. Tamura Report at p. 6. Accordingly, the DEIR should have related the Project's emissions to likely health consequences so that the public is apprised of these impacts and so decisionmakers could make informed decisions regarding the costs and benefits of the Project.

Although the DEIR acknowledges its obligations under CEQA, it declines to conduct this necessary health impact analysis. Instead, the DEIR looks to the health impact analyses prepared in connection with two other recent EIRs and concludes that the human health

impact assessments for those projects did not "move the dial" with regard to regional human health impacts. DEIR at p. 4.1.1-17. The two EIRs the DEIR relies on are the Norman Y. Mineta San Jose International Airport Master Plan ("San Jose Airport EIR") and the Inglewood Basketball and Entertainment Center Project ("IBEC EIR"). Both the San Jose Airport EIR and the IBEC EIR conducted the necessary health impact analyses for their respective projects, as CEQA requires. DEIR at p. 4.1.1-15. Yet, the ATMP DEIR dismisses its obligation to conduct a health impact assessment for the Project, claiming that the level of effort to do would be substantial in terms of schedule and personnel hours and because the analyses conducted for the San Jose Airport and IBEC projects found negligible changes to regional health impacts. DEIR at p. 4.1.1-17.

Tamura reviewed the health impact assessments prepared for the San Jose Airport and IBEC projects. He determined that the IBEC Project did not have comparable NOx emissions to the Project (i.e., the ATMP would generate substantially greater NOx emissions than would the IBEC Project). The San Jose Airport Project EIR identified current (2018) NOx emissions of 3,853 lb/day (far less than LAX's current 30,690 lb/yr) and estimated that these emissions would increase by 5,325 lb/day by 2037 (19 years out). Tamura Report at p. 7.

Unlike the San Jose Airport EIR which calculated emission increases over a 19-year period, the ATMP DEIR evaluated emissions over only a 10-year period. Despite this different in forecasting timeframe, the ATMP DEIR concludes that:

[i]f the proposed Project emissions were applied to the SJC site, the resulting health impacts from ozone would likely be the same as, or less than, those modeled for the SJC Master Plan Amendment Draft EIR…the resulting change in health end-point incidences would be <0.05 percent for both ozone and PM2.5 emissions.

DEIR at p. 4.1.1-42. According to Tamura, there are several flaws with the DEIR's discussion of this topic:

• As discussed previously, the DEIR does not accurately reflect the full extent of the increase in emissions that would result from the ATMP because it only identifies the "proposed Project emissions" between 2018 and 2028.

• The DEIR incorrectly attempts to apply the Project's emissions to the San Jose Airport site. The DEIR neglects the well-established fact that ozone impacts are not a function of project emissions alone, they are a complex function of NOx and VOC emissions in the surrounding environment, meteorology (including sunlight/temperature), and topography. All of these factors necessarily differ between the South Coast Air Basin and the San Francisco Bay Area Air Basin (the location of the San Jose Airport). Therefore, making a quantitative statement regarding the Project's ozone impacts based on applying its emissions to photochemical modeling conducted in San Jose is not valid.

• The DEIR provides no explanation as to how it determines that the Project's health impacts would be the same or less than those generated by the San Jose Airport Project. Tamura Report at p.7.

Nor can the DEIR dismiss its obligation to conduct the required health impact analysis because it would require substantial effort. As explained by the Court in *Laurel Heights Improvement Ass'n of San Francisco v. Regents of the University of California* (1988) 47 Cal.3d 376, 399 ("*Laurel Heights I*"), "[w]e find no authority that exempts an agency from complying with the law, environmental or otherwise, merely because the agency's task may be difficult."

As Tamura explains, given the magnitude of the NOx emissions associated with LAX, as well as the climate and topography of the South Coast Air Basin, it is hard to imagine a site more deserving of photochemical grid modeling than this one. Tamura Report at p.8. Given that the Project's NOx emissions—generated during the truncated 10-year analysis period (2018 Baseline to 2028 With Project) alone—would far exceed the SCQAMD's significance thresholds, the EIR must be revised to relate the expected adverse air quality impacts (pollutant concentrations) to the Project's likely health consequences. As the San Jose Airport and IBECs EIRs have clearly demonstrated, it is feasible to conduct such health impact analyses.

Response: The commenter asserts that the Draft EIR failed to analyze the health impacts of secondary pollutants[1] and that the Draft EIR does not assess health impacts due to exposure to these pollutants. These assertions are incorrect. Two evaluations were conducted for the Draft EIR that compared emissions between the proposed Project and two projects whose EIRs provided detailed health impact assessments based on modeling: Norman Y. Mineta San Jose International Airport Master Plan Amendment (hereafter referred to as the SJC Master Plan Amendment),[2] and the Inglewood Basketball and Entertainment Center Project (hereinafter referred to as the IBEC Project).[3] These two projects were selected for analysis in the Draft EIR in order to provide a comparison of the proposed Project and a project similar in nature and with comparable types of emission sources (i.e., the SJC Master Plan Amendment involves improvements related to construction and operations at a large commercial airport) as well as a comparison of the proposed Project and a project in a similar location with similar meteorology (e.g., sunlight, temperature) and geography (i.e., the IBEC Project, which is located approximately four miles east of LAX). As described in Section 4.1.1.2.6 of the Draft EIR, the analysis used data and conclusions from the SJC Master Plan Amendment Draft EIR and the IBEC Draft EIR, which both included detailed secondary pollutant formation modeling and assessment of associated health impacts. The Draft EIR did not dismiss its obligation to study the health impacts of secondary air pollutants. Rather, the Draft EIR concluded that re-inventing a new, full-scale regional dispersion and health impact model was not warranted and a different methodology for assessing these impacts was developed. The methodology that was developed for the Draft EIR is quantitative in nature, uses modeled results from similar projects, and reaches conclusions regarding the human health effects that would occur from the proposed Project's secondary air pollutants that are supported by substantial evidence. CEQA does not require that a lead agency use a particular methodology for determining a project's impacts. (See *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 521 ("Friant Ranch") [An EIR is only required to "provide an adequate analysis to inform the public how its bare numbers translate to create potential adverse impacts..."].) Rather, the nature of the analysis is left to the discretion of the lead agency. The comparison of emissions between the proposed Project and the SJC Master Plan Amendment and the IBEC Project

was a reasonable and appropriate method for determining the order-of-magnitude of impacts from secondary pollutants, such as ozone and PM2.5, associated with the proposed Project. This methodology related the Project's emissions to the likely health consequences of exposure to secondary air pollutants, as required by the Friant Ranch decision.

The cost of performing the modeling proposed by the commenter is considerable. Such an analysis would involve using a USEPA's Community Multiscale Air Quality (CMAQ) model using meteorology, emissions, chemical transport, and other environmental conditions as inputs to model regional ozone impacts. The analysis would also involve developing an emissions profile and modeled results on a basin-wide grid. The modeled outputs would then be used with USEPA's Environmental Benefits Mapping and Analysis Program - Community Edition (BenMAP-CE) to estimate resulting health effects. The modeling involves estimating changes in air pollutant concentrations on a grid that encompasses the entire air basin, and then estimating the changes in human health that would result due to these changes in concentrations attributable to the project. It is likely that performing such modeling for the LAX Airfield and Terminal Modernization Project would cost in excess of $100,000. Yet, as the analyses performed for the IBEC and SJC Master Plan Amendment show, these tools do not provide meaningful information. LAWA, in its discretion, has determined that spending such a large amount of money to provide information of limited, if any, value would be an imprudent use of public funds. That is particularly true where, as here, LAWA can draw conclusions from the analyses performed for IBEC and the SJC Master Plan Amendment EIRs.

The methodology used to address health impacts from exposure to secondary pollutants is detailed in Section 4.1.1.2.6 of the Draft EIR. The discussion of air quality health-related impacts from the proposed Project is provided in Section 4.1.1.5 of the Draft EIR. A summary of the analysis contained in the Draft EIR is provided below.

Summary of Draft EIR Analysis

Construction Impacts

An assessment of the potential formation of secondary pollutants from proposed Project construction emissions is included in Section 4.1.1.5.1 of the Draft EIR under the heading "Photochemical Modeling of Secondary Air Pollutants – Construction." As described in Section 4.1.1.2.6 of the Draft EIR, the analysis used data and conclusions from the SJC Master Plan Amendment Draft EIR and the IBEC Draft EIR, which both included detailed secondary pollutant formation modeling and assessment of associated health impacts. As noted above, one of these projects was a commercial airport (SJC) master plan amendment and the other project was a basketball and entertainment center (IBEC) located within three miles of LAX.

Table 4.1.1-9 in the Draft EIR presents the comparison of NOx and VOC (ozone precursor) emissions between the SJC Master Plan Amendment, the IBEC Project, and the proposed Project construction emissions, followed by a discussion of the relative difference in impacts to health risk end-points, or secondary pollutant concentrations, between the proposed Project and the SJC Master Plan Amendment and the IBEC Project. Regarding

ozone and its precursors, the maximum change in a health impact assessment end-point for the SJC Master Plan Amendment was 15 for asthma-related hospital visits per year for people ages 19 to 99, representing a 0.02 percent increase above baseline, as noted on page 4.1.1-16 in Section 4.1.1.2.6.2 of the Draft EIR. As noted on page 4.1.1-41 in Section 4.1.1.5.1.1 of the Draft EIR, the proposed Project construction emissions of combined NOx and VOC would be 4.8 times lower than those emissions for the SJC Master Plan Amendment. Therefore, the proposed Project construction impacts to health would be lower than those calculated for the SJC Master Plan Amendment Draft EIR if the proposed Project emissions were located at SJC.

The IBEC emissions analyzed for health impacts were also summarized in Table 4.1.1-9 of the Draft EIR. The proposed Project construction emissions are estimated to be 8.1 times higher for NOx and 3.9 times higher for VOC than those for the IBEC Project. The IBEC emissions only changed ozone concentration by 0.0109 parts per billion (ppb) at the most impacted receptor (see page 4.11-17 in Section 4.1.1.2.6.2 of the Draft EIR), producing no change to the reported ozone concentration with or without the IBEC Project (the ozone Ambient Air Quality Standard is 70 ppb). Increasing the change to the modeled incremental ozone concentration by a factor 8.1 to represent the potential impact from proposed Project, construction emissions would result in an incremental ozone concentration increase of approximately 0.09 ppb, which is still not sufficient to change reported ozone concentrations at the ppb level. The reported IBEC most-changed health endpoint was 66 minor restricted activity days per year due to acute respiratory symptoms, representing a 0.00007 percent change from the baseline (see page 4.1.1-17 in Section 4.1.1.2.6.2 of the Draft EIR).

Operational Impacts

An assessment of the potential formation of secondary pollutants from proposed Project operational emissions is included in Section 4.1.1.5.2 of the Draft EIR under the heading "Photochemical Modeling of Secondary Air Pollutants – Operations." As with the construction emissions analysis, and as described in Section 4.1.1.2.6 of the Draft EIR, the analysis used data and conclusions from the SJC Master Plan Amendment Draft EIR and the IBEC Draft EIR, which both included detailed secondary pollutant formation modeling. Table 4.1.1-12 in the Draft EIR presents the comparison of NOx, VOC, and PM2.5 (ozone and PM2.5 precursor) emissions between the SJC Master Plan Amendment, the IBEC Project, and the proposed Project operational emissions, followed by a discussion of the relative difference in impacts to health risk end-points, or secondary pollutant concentrations, between the proposed Project and the SJC Master Plan Amendment and the IBEC Project.

Regarding ozone and its precursors, the maximum change in a health impact assessment end-point for the SJC Master Plan Amendment was 15 for asthma-related hospital visits per year for people ages 19 to 99, representing a 0.02 percent increase above baseline, as noted on page 4.1.1-16 in Section 4.1.1.2.6.2 of the Draft EIR. As noted on page 4.1.1-48 in Section 4.1.1.5.2.1 of the Draft EIR, the proposed Project operational emissions of combined NOx and VOC would be substantially lower than those emissions for the SJC Master Plan Amendment. Therefore, the proposed Project operational impacts to health

would be lower than those calculated for the SJC Master Plan Amendment Draft EIR if the proposed Project emissions were located at SJC.

The IBEC emissions analyzed for health impacts were also summarized in Table 4.1.1-12 of the Draft EIR. The proposed Project operational emissions are estimated to be 25 times higher for NOx than those for the IBEC Project. The proposed Project operational VOC emissions would be less than zero, indicating that VOC reductions would partially offset the increase in NOx. The IBEC Project emissions only changed ozone concentration by 0.0109 ppb at the most impacted receptor (see page 4.11-17 in Section 4.1.1.2.6.2 of the Draft EIR), producing no change to the reported ozone concentration with or without the IBEC Project (the ozone Ambient Air Quality Standard is 70 ppb). Increasing the change to the modeled incremental ozone concentration by a factor 25 (which conservatively ignores the decrease in VOC emissions) to represent the potential impact from proposed Project, operational emissions would result in an incremental ozone concentration increase of approximately 0.27 ppb, which is still not sufficient to change reported ozone concentrations at the ppb level. The reported IBEC most-changed health endpoint was 66 minor restricted activity days per year due to acute respiratory symptoms, representing a 0.00007 percent change from the baseline (see page 4.1.1 17 in Section 4.1.1.2.6.2 of the Draft EIR).

Conclusions

The Tamura Report, included as Attachment D to this comment letter, argued that the Draft EIR did not adequately address the possible health impacts of secondary pollutants that could occur from the proposed Project's emissions. However, as discussed in detail above and summarized here, these assertions are incorrect. The commenter attempts to argue that, because operational emissions for the proposed Project were only evaluated over a 10-year period versus the 19-year period addressed in the SJC Master Plan Amendment Draft EIR, the Draft EIR does not accurately reflect the full extent of the increase in emissions that would result from the proposed Project. Please refer to Topical Response TR-ATMP-G-3 regarding the selection of the horizon year for impact analyses for the LAX Airfield and Terminal Modernization Project Draft EIR. The study period used for the SJC Master Plan Amendment Draft EIR is not relevant to the study period for the proposed Project. The SJC Master Plan horizon year of 2037 was selected because that was the year that the proposed Master Plan improvements were expected to be completed. The LAX Airfield and Terminal Modernization Project improvements are expected to be completed by 2028; thus, the Draft EIR analyzes that year.

The commenter asserts that the IBEC Project emissions were too low to use for comparison to the proposed Project. However, the Draft EIR did not solely compare emissions from the proposed Project to emissions from the IBEC Project. Rather, the Draft EIR applied a ratio to the IBEC Project results, which reflected the difference between the proposed Project emissions and the IBEC Project emissions. The IBEC Draft EIR provided emissions, secondary pollutant concentrations, and associated health impacts based on modeling. The LAX Airfield and Terminal Modernization Project Draft EIR applied a ratio to those results so that they could be adjusted to reflect the emissions associated with the proposed Project. Applying a ratio of those emissions to the IBEC health impact results is a technically sound method for developing order-of-magnitude

health impacts associated with the proposed Project. The IBEC is located approximately four miles from LAX and is in the same source-receptor area of the same air basin as the proposed Project. Therefore, the IBEC Project is an appropriate project to use in estimating the potential health impacts associated with the proposed Project's air pollutant emissions.

The commenter also asserts that making a quantitative statement regarding the proposed Project's ozone impacts by applying the proposed Project's emissions to the SJC Master Plan Amendment Draft EIR modeling results is not valid. That assertion is unsupported and inaccurate. The conclusion in the LAX Airfield and Terminal Modernization Project Draft EIR that the proposed Project operational impacts on health would be the same as, or less than, those modeled for the SJC Master Plan Amendment Draft EIR if those emissions were located at SJC was based on the fact that the proposed Project operational emissions are estimated to be substantially lower for NOx and VOC (ozone and PM2.5 precursors). The Draft EIR notes that the comparison to the SJC Master Plan Amendment impacts was based on the assumption that the proposed Project emissions would be located at SJC, and acknowledges that SJC is not located within the same air basin. This is the reason that the LAX Airfield and Terminal Modernization Project also included comparisons to the IBEC Project impacts since that facility is in close proximity (within four miles) to LAX and in the same source-receptor area of the same air basin as the proposed Project, as noted above. In acknowledgement of this fact, page 4.1.1-16 of the Draft EIR singles out the IBEC Draft EIR as being particularly relevant, stating, "[t]he IBEC Draft EIR analysis provides substantially useful information regarding the type and level of health impacts that would likely be associated with the proposed Project's secondary ozone and PM2.5 precursor emissions." By including both analyses, the Draft EIR compared the proposed Project to a project whose emission sources are comparable (i.e., the SJC Master Plan Amendment) as well as to a project located in the same area and with similar meteorological and geographic conditions (i.e., the IBEC Project). These comparisons provide a reasonable assessment of the expected level of health impacts associated with the proposed Project.

[1] Secondary pollutants are formed in the atmosphere due to reaction of directly emitted precursor pollutants. Ozone is a secondary pollutant formed from the reaction of oxides of nitrogen (NOx) and volatile organic compounds (VOC) in the presence of sunlight. Fine particulate matter (PM2.5) is a regulated air pollutant that is made up of both directly emitted PM2.5 and secondary PM2.5 formed from precursors NOx, VOC, ammonia, and sulfur oxides (SOx).
[2] City of San Jose, Draft Environmental Impact Report for Amendment to Norman Y. Mineta San Jose International Airport Master Plan, State Clearinghouse No. 2018102020, prepared by David J. Powers & Associates, Inc., November 2019.
[3] City of Inglewood, Inglewood Basketball and Entertainment Center Project Draft Environmental Impact Report, State Clearinghouse No. 2018021056, prepared by ESA and Fehr & Peers, December 2019.

ATMP-AL010-148

Comment: 3. The DEIR Understates the Project's Air Quality Impacts Because it Underestimates Emissions.

In addition to the DEIR's failure to acknowledge air pollutant emissions from the Project's operational growth beyond 2028, the DEIR underestimates the Project's potential to increase emissions for the following reasons.

First, in its calculation of the Project's air pollutant emissions, the DEIR assumes emission reductions from the LAMP's transportation projects. See DEIR at pp. 4.1.1-18, 4.1.1-19. However, the DEIR lacks evidentiary basis that these LAMP projects would reduce emissions. As discussed above, although the DEIR does not acknowledge it, the Project would erode the trip reduction benefits of the LAMP's transportation projects (i.e., the Project would erode the increases in transit ridership and the decreases in vehicular trips that were intended to result from the LAMP projects). Consequently, the Project cannot assume emission reductions from the LAMP's transportation projects. If LAWA insists on assuming emission reductions from the LAMP projects, to be truly transparent, the revised EIR must specifically demonstrate how each LAMP transportation project would reduce emissions.

Response: As discussed on page 4.8-6 in Section 4.8 of the Draft EIR, the surface transportation characteristics around LAX will be substantially changed by the improvements associated with Phase 1 of the LAX Landside Access Modernization Program. Of those improvements, the Automated People Mover (APM), the Intermodal Transportation Facilities (ITFs), the consolidated rental car (CONRAC) facility, and the Phase 1 roadways are approved, funded, under construction, and will all be completed and operational prior to completion of the proposed Project in 2028. To perform the analysis, without taking into account the effect of these improvements, would be misleading. The Project Travel Demand Model was updated with Socio-Economic and Demographic (SED) and roadway network improvements that accounted for future growth and changes in traffic conditions, including expected changes in mode splits.

Because these improvements would change the existing vehicle miles traveled (VMT) around LAX, it was important that they be incorporated into the travel demand modeling completed in the Draft EIR to accurately predict expected traffic volumes in 2028. The emissions inventory and air dispersion modeling completed in the Draft EIR are consistent with the travel demand modeling and assumptions in the traffic analysis (see Section 4.8 of the Draft EIR). Therefore, any reductions in emissions are based on the best data and modeling tools available at the time of analysis.

With regard to the assertion that implementation of the proposed Project would erode the benefits of the LAX Landside Access Modernization Program improvements, please see Response to Comment ATMP-AL010-109. Please see Topical Response TR-ATMP-G-3 regarding the reasons why 2028 is the appropriate horizon year for evaluating the impacts of the proposed Project.

ATMP-AL010-149

Comment: Second, the DEIR also underestimates the Project's increase in criteria air pollutant emissions, because it does not account for all of the vehicular travel to and from LAX. As explained in Part V.C, the DEIR only accounts for a portion of the VMT that would be generated by the ATMP. Consequently, the DEIR must revised to include air pollutant emissions from all of the vehicular travel associated with the Project.

Response: As detailed in Section 4.1.1.2.3.3 of the Draft EIR, "regional emissions associated with airport-related traffic were calculated for both peak daily and peak annual periods. Mileage used for estimating emissions was based on all airport-related trip miles within the South Coast Air Basin." Thus, as stated in Section 4.1.1.2.3.3, all vehicular travel to and from LAX was evaluated. Specifically, when comparing the change in airport-related traffic between 2018 and 2028, the analysis included emissions from all trips to or from airport facilities including trips to or from facilities developed under previous airport projects such as the intermodal transportation and consolidated rental car facilities developed under the LAX Landside Access Modernization Program. Regional emissions associated with non-airport-related traffic in the vicinity of the airport were not assessed as part of the air quality or GHG analysis in the Draft EIR outside of their contribution to the background pollutant concentrations.

The commenter also asserts that the analysis done as part of the comment letter, specifically, Part V.C, finds the VMT analysis is incomplete. Please see Responses to Comments ATMP-AL010-97 through ATMP-AL010-141, as well as Response to Comment ATMP-AL010-227 for further discussion of the adequacy of the VMT analysis in Section 4.8 of the Draft EIR.

ATMP-AL010-150

Comment: Third, the DEIR incorrectly assumes emission reductions from certain LAWA plans, measures and policies (DEIR pp. 4.1.1-25, 4.1.1-26), yet the document does not provide the necessary assurance that these plans, measures and policies will be implemented or would provide meaningful emission reductions. Examples of these plans, measures and policies include the following:

• Use of grid based electric power at construction sites. This LAWA policy states that "[e]very effort shall be made to utilize grid-based electric power at any construction site, where feasible . . . ." DEIR at p. 4.1.1-27. This policy is written in a manner that does not ensure any action by LAWA as it includes language such as "every effort" and "where feasible."

Response: The commenter asserts that the Draft EIR incorrectly assumes emission reductions from the use of grid based electric power at constructions sites. As discussed on page 4.1.1-18 in Section 4.1.1 of the Draft EIR, "[t]he policies and Project features that were included in the calculations were those with specific targets or other information that could be used to quantify air pollutant emission reductions." Of the 93 measures that LAWA reviewed for mitigation (see Appendix C.9), only six measures related to

construction activities were sufficient for quantification and related emission reductions. However, as stated on page 4.1.1-19 in Section 4.1.1 of the Draft EIR, several other measures would likely reduce emissions, but could not be quantified because sufficient data to determine the reduction quantities were not available or verifiable. Using the electric grid for construction equipment is acknowledged as a policy that cannot be quantified. There are several limitations, including lack of availability and accessibility of grid power, that could prevent LAWA or contractors from using grid-based power during construction; however, grid-based power would be used whenever available from a direct hookup or a tie into electricity from power poles. The Draft EIR did not assume any emission reductions from this measure.

ATMP-AL010-151

Comment: • Use of USEPA Tier 4 standards. This policy states that "off-road diesel-powered equipment are required to meet USEPA Tier 4 (final) standards or the next cleanest equipment available, as approved by LAWA, with some exceptions." DEIR at p. 4.1.1-27. This policy does not ensure any action by LAWA because it allows for, but does not define, the policy's exceptions.

Response: The commenter's assertion that LAWA's policy concerning USEPA Tier 4 equipment does not ensure any action by LAWA because it does not define the policy's exceptions is incorrect. Construction equipment emission requirements are set forth in Section 7 of LAWA's Design and Construction Handbook (DCH)[1], and include the requirement that off-road diesel-powered equipment greater than 50 horsepower must meet U.S. Environmental Protection Agency (USEPA) Tier 4(final) standards or the next cleanest equipment available, subject to LAWA approval. The DCH clearly identifies the allowable exceptions from this requirement. Only after the contractor documents a good-faith effort to procure Tier 4(final) equipment, or demonstrates that use of equipment that does not meet the Tier 4(final) standards would not exceed the time limits outlined in the DCH, would LAWA approve the use of other equipment. In accordance with the DCH, if an approval is granted, the contractor would be required to provide the next cleanest piece of equipment as provided in a stepdown schedule in the DCH.

This comment is also related to the commenter's previous assertions in comment ATMP-AL010-150, in which the commenter alleges that the Draft EIR incorrectly assumes emission reductions from certain LAWA plans, measures, and policies. That assertion is incorrect. Please see Response to Comment ATMP-AL010-150. With respect to the assertion that the Draft EIR incorrectly assumes emission reductions from the use of USEPA Tier 4 standards (the assertion is provided in the text that leads into comment ATMP-AL010-151), as shown on page 18 of the PDF in Appendix C of the Draft EIR, the emission calculations assumed 65 percent of construction equipment would meet Tier 4(final) standards, 30 percent would meet Tier 4 Interim standards, and 5 percent would meet Tier 3 standards. These assumptions were based on experience with prior LAX construction projects and known information about the fleet mix of construction equipment available in the area. For these reasons, the Draft EIR does not incorrectly assume emission reductions associated with this policy. To the contrary, the emission

reductions assumed in the calculation of air quality impacts in the Draft EIR are reasonable and achievable.

[1] City of Los Angeles, Los Angeles World Airports, 2020 Design and Construction Handbook (DCH), Version 1.0, June 30, 2020. Available: https://www.lawa.org/en/lawa-businesses/lawa-documents-and-guidelines/lawa-design-and-construction-handbook

ATMP-AL010-152

Comment: • LEED Certification. This policy calls for "LEED Silver certification if the project meets the U.S. Green Building Code (USGBC) and LAWA LEED® Eligibility Criteria, unless exempted by LAWA's Sustainability Review Committee." DEIR at p. 4.1.1-27. Because this policy allows LAWA to exempt a project from meeting LEED Silver certification, but does not provide any explanation as to why such exemptions could be given, it does not commit LAWA to take action.

Response: The commenter's assertion that LAWA has not committed to taking an action with respect to LEED® Silver certification for the proposed Project is incorrect. The text that is quoted in the comment is from page 4.1.1-27 in Section 4.1.1 of the Draft EIR, which is simply a list of measures in LAWA's DCH that apply to the proposed Project. However, Project features in Section 4.1.1.2.7 of the Draft EIR, specifically, the text on page 4.1.1-20, clearly states that LAWA would require the design and construction of Concourse 0 and Terminal 9 to achieve LEED® Silver requirements, at a minimum, in accordance with LAWA's adopted Sustainable Design and Construction Policy and DCH (see also page 2-58 in Chapter 2 of the Draft EIR).

This comment is also related to the commenter's previous assertions in comment ATMP-AL010-150, in which the commenter alleges that the Draft EIR incorrectly assumes emission reductions from this measure. However, as stated on page 4.1.1-19 in Section 4.1.1 of the Draft EIR, several LAWA policies and Project features would likely reduce emissions but could not be quantified because sufficient data to determine the reduction quantities were not available or verifiable. As noted on page 4.1.1-20 in Section 4.1.1 of the Draft EIR, the requirement that Concourse 0 and Terminal 9 meet LEED® Silver requirements is a Project feature that could not be quantified. The Draft EIR did not assume any emission reductions from this measure.

ATMP-AL010-153

Comment: • Electrification of Aircraft Parking Positions. The DEIR assumes air pollutant emission reductions from the electrification of all new aircraft parking (DEIR p. 4.1.1-26; 4.1.1-27), yet there is no assurance this electrification will occur and pre-conditioned air will be provided. See DEIR at p. 4.1.1-27 stating that "[a]ll new aircraft parking positions shall be installed with ground power and pre-conditioned air, where applicable… ." By including language such as "where applicable," the DEIR does not provide certainty that emissions will be reduced. LAWA must confirm that all new aircraft parking positions

shall be electrified and pre-conditioned air will be provided. Alternatively, the DEIR should not assume emissions reductions from the electrification of aircraft parking.

Response: The commenter asserts that the Draft EIR provides no assurance that electrification of all new aircraft parking positions would occur, and that the Draft EIR incorrectly assumes emission reductions from this measure. Contrary to the commenter's assertion that there is no assurance that electrification of all new aircraft parking positions would occur, LAWA has committed to the electrification of gates associated with the proposed Project. The text that is quoted in the comment above is from page 4.1.1-27 in Section 4.1.1 of the Draft EIR, which is simply a list of measures in LAWA's DCH that apply to the proposed Project and does not fully encompass LAWA's commitment to the electrification of gates associated with the proposed Project. However, Table 2-3 on page 2-60 in Chapter 2 of the Draft EIR specifically identifies gate electrification as a feature of the proposed Project with the express purpose of reducing air pollutant emissions associated with auxiliary power units (APUs).

The commenter's assertion that the Draft EIR incorrectly assumes emission reductions from this measure is also inaccurate. Assumptions regarding the use of APUs are identified in Section 4.1.1.2.3.2 on page 4.1.1-11 of the Draft EIR. As explained in that section, emissions of criteria pollutants from aircraft APUs were estimated using the AEDT 3b APU assignments to aircraft type. Consistent with existing passenger gates at LAX terminals and with the goals of LAWA's Sustainability Action Plan, it was assumed that the new gates at Concourse 0 and Terminal 9 would have pre-conditioned air and gate power supplied by the electrical grid. APU operating times at these gates were assumed to be 15 minutes per landing and takeoff (LTO) turnaround. For parking positions that do not have gate power and pre-conditioned air (such as for some remote gates and some cargo aircraft parking positions), APU operating times per LTO were assumed to be 40 minutes for narrow-body aircraft, 60 minutes for wide-body aircraft (except the Airbus 380 series), and 120 minutes for the Airbus 380 series. Page 4.1.1-14 further explains that the temporal pattern for aircraft was then applied to GSE/APU sources at the terminals and other aircraft parking areas. The results were then compared to both the 2018 Baseline (Table 4.1.1-10) and the 2028 Without Project (Table 4.1.1.11) scenarios and analyzed accordingly. Therefore, the Draft EIR did not incorrectly assume a reduction in emissions from the electrification of aircraft parking. The assumptions in the Draft EIR were reasonable.

ATMP-AL010-154

Comment: The DEIR errs by assuming emission reductions from measures such as the aforementioned. The DEIR should have calculated the Project's emissions without these plans, measures and policies. The revised EIR should correct all of the aforementioned issues and revise its emissions estimates.

Response: Please see Responses to Comments ATMP-AL010-150 through ATMP-AL010-153 above. As outlined in those responses, the Draft EIR only quantified an emission reduction measure if sufficient data to complete calculations were available or verifiable; for those measures where such data were not available, no emission reductions were assumed

(e.g., use of grid-based power at construction sites and LEED® Silver certification for Concourse 0 and Terminal 9). While emission reductions from Tier 4 equipment and gate electrification were quantified, realistic assumptions about the degree of quantifiable reductions were made based on experience with previous projects. No revisions to the emission estimates in the Draft EIR are required.

ATMP-AL010-155

Comment: 4. The DEIR's Air Quality Mitigation Measures Fail to Satisfy CEQA's Standards

(a) The Measures Discussed in the ATMP DEIR Are Impermissibly Vague and Unenforceable

The DEIR identifies several mitigation measures that would allegedly reduce the ATMP's significant air quality (and GHG) impacts. These measures—MM-AQ/GHG (ATMP)-1: Rock Crushing Operations; MM-AQ/GHG (ATMP)-2: Use of Renewable Diesel Fuel; MM-AQ/GHG (ATMP)-3: Parking Cool Roof; MM-AQ/GHG (ATMP)-4: EV Charging Infrastructure; and MM-AQ/GHG (ATMP)-6: Solar Energy Technology—fail to commit LAWA to specific, enforceable actions that will reduce or avoid Project emissions to the extent feasible. Mitigation measures proposed in an EIR must be "fully enforceable" through permit conditions, agreements, or other legally binding instruments that will ensure the measures are actually implemented—not merely adopted and then disregarded. Pub. Resources Code § 21081.6(b); CEQA Guidelines § 15126.4(a)(2); *Anderson First Coalition*, 130 Cal.App.4th at 1186-87; *Federation of Hillside & Canyon Assns.*, 83 Cal.App.4th at 1261.

Response: Recommended mitigation measures pertaining to air quality are identified in Section 4.1.1.5 of the Draft EIR. The mitigation measures identified in the EIR would be incorporated into a Mitigation Monitoring and Reporting Program (MMRP) that would include the full text of each mitigation measure and would identify the timing of implementation, monitoring frequency, and actions indicating compliance for each measure. Certification of the EIR for the proposed Project, and adoption of the MMRP, would commit LAWA to specific, enforceable actions.

With regards to the specific mitigation measures mentioned in this comment, please refer to Responses to Comments ATMP-AL010-178 (Rock Crushing Operations), ATMP-AL010-157 (Renewable Diesel Fuel), ATMP-AL010-158 (Electric Vehicle Charging Infrastructure), and ATMP-AL010-159 (Solar Energy).

ATMP-AL010-156

Comment: MM-AQ/GHG (ATMP)-1: Rock Crushing Operations calls for contractors to conduct rock-crushing operations on-site and to reuse waste rock. DEIR at p. 4.4-31. This measure is vague and unenforceable and provides no assurance that the measure will actually be implemented. It includes non-committal language "to the maximum extent feasible"

(DEIR at p. 4.4-31) and does not explain how a determination of feasibility would be made.

Response: The content of this comment is essentially the same as comment ATMP-AL010-178; please refer to Response to Comment ATMP-AL010-178. Regarding the enforceability of this mitigation measure, please also see Response to Comment ATMP-AL010-155.

ATMP-AL010-157

Comment: Similarly, MM-AQ/GHG (ATMP)-2 calls for use of renewable diesel fuel for equipment and trucks as feasible based on commercial renewable fuel availability. DEIR at p. 4.4-31. Here too, the measure does not explain how LAWA will determine if the use of renewable diesel fuel is feasible. In particular, the measure calls for the use of fuels only if they are available at a "comparable price" and without incurring "a substantial transportation cost." Yet, phrases such as "comparable price" and "substantial transportation cost" are vague and non-specific and the measure is therefore unenforceable.

Response: Section 21061.1 of the Public Resources Code defines "feasible" as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors." Section 15364 of the State CEQA Guidelines generally repeats this definition verbatim but adds "legal" considerations to those which may be taken into account in determining the feasibility of mitigation measures. The definition is inherently and intentionally subjective, allowing a lead agency to determine the feasibility of a measure based on relevant, project-specific conditions. In the case of Mitigation Measure MM-AQ/GHG (ATMP)-2 (see page 4.1.1-43 of the Draft EIR), the measure requires the use of renewable diesel fuel in on-site construction equipment and trucks as feasible based on regional commercial renewable fuel availability. The measure further details key considerations of feasibility as being fuel availability at comparable pricing, and fuel availability within reasonable proximity of the Project so as to not incur substantial transportation costs. The reasons for inclusion of these considerations are twofold.

First, these considerations afford a measure of economic equity, allowing smaller construction contractors to more reasonably compete with larger contractors for parts of the Project implementation.

Second, the availability of renewable diesel fuel is inconsistent within the region. The preeminent producer of renewable diesel fuel in the region is the World Energy Paramount Refinery, located in Paramount, California, approximately 12.5 miles east/southeast of LAX. The facility produces both renewable diesel and sustainable aviation jet fuel in varying amounts depending on market conditions (i.e., renewable diesel and sustainable aviation jet fuel compete for the refinery's operational throughput depending on which is more profitable to produce). It would be speculative to assume that renewable diesel fuel would always be produced and available in quantities to fully support the demand of the proposed Project and the demands of other projects within the region, especially when considering the competing demand for

sustainable aviation fuel from aircraft operators at LAX. (It should be noted that, although renewable diesel fuel may not always be feasibly available for Project use from the AltAir Paramount Refinery, emissions reductions could occur at LAX associated with the purchase and use of the competing sustainable aviation jet fuel.)

The consideration of transportation costs is intended to address the potential future availability of renewable diesel from sources located farther from the airport. This potential future availability is at best speculative, and the measure grants the lead agency reasonable discretion in determining the economic, environmental, legal, social, and technological factors associated with transporting fuel over substantially longer distances than would otherwise occur if they could be obtained locally.

The potential emissions reductions associated with the use of renewable diesel fuel for the proposed Project were not quantified in the Draft EIR, leading to a conservative finding regarding the significance of construction impacts with respect to air quality emissions after mitigation in Section 4.1.1.5.1.3 of the Draft EIR.

Regarding the enforceability of this mitigation measure, please see Response to Comment ATMP-AL010-155.

ATMP-AL010-158

Comment: MM-AQ/GHG (ATMP)-4 calls for LAWA to install electric vehicle ("EV") charging infrastructure in the Terminal 9 parking facility. This measure also falls short of any specific, enforceable commitment to take action. Instead of providing detailed information as to how the measure will be implemented, the DEIR defers the identification of the number and types of Electric Vehicle Supply Equipment ("EVSE") and Electric Vehicle Charging Stations ("EVCS") parking spaces to a later date. "Formulation of mitigation measures should not be deferred until some future time." CEQA Guidelines § 15126.4(a)(1)(B). However, where mitigation for an impact "is known to be feasible," but where "practical considerations prohibit devising such measures early in the planning process," an agency "can commit itself to eventually devising mitigation measures that will satisfy specific performance criteria articulated at the time of project approval." *Cleveland National Forest Foundation v. San Diego Ass'n of Govt's* (2017) 17 Cal.App.5th 413, 442-43 ("*Cleveland II*"). In order to defer formulation of mitigation measures, therefore, an agency must demonstrate (a) that mitigation of the impact is feasible; (b) that practical considerations preclude devising measures at the time of review; (c) specific, articulated performance criteria that will avoid or lessen the impact; and (d) a binding commitment to adopt measures that will meet or exceed those performance standards. The DEIR provides no explanation as to why LAWA could not specifically identify the number and location of EV charging stations now, prior to Project approval.

In addition, while this measure calls for LAWA to exceed the minimum requirements for EVSE and EVCS "specified in the code" by 5%, it does not identify the code or the code requirements so it is not possible to determine whether this measure would in fact result in an exceedance of the code's requirements. Nor does the DEIR explain how it arrived

at this 5% figure nor whether LAWA could exceed this 5% figure. Given that the Project's criteria air pollutant and GHG emissions have been determined to be significant and unavoidable impacts, LAWA must examine whether it can feasibly increase the amount of on-site EV infrastructure at LAX.

Response: As detailed in Mitigation Measure MM-AQ/GHG (ATMP)-4 (see page 4.1.1-49 of the Draft EIR), the Terminal 9 parking facility would be outfitted with electric vehicle (EV) charging infrastructure beyond the minimum amount required by code at the time of design by at least 5 percent. This is not an improperly "deferred" mitigation measure. For purposes of discussion, applicable building codes at the time of publication of the Draft EIR include the California Green Building Code (CALGreen) and the Los Angeles Green Building Code (LAGBC). Because the proposed Project has not yet been approved or designed, the code requirements that would be in effect at the time of design could not be identified in the Draft EIR. Because the specific design of the parking facility has not been developed, it is not feasible to identify the specific location where EV charging stations would be provided. It is anticipated, however, that EV charging stations would be distributed at convenient, readily identifiable locations within the parking facility, as this is the design approach that has been successfully implemented at other parking facilities at LAX and other airports. With regards to the commenter's assertion that it is not possible to determine whether this measure would result in an exceedance of the code's requirements, the mitigation measure clearly states that the charging infrastructure would, by definition, exceed the amount required by code at the time of design by at least 5 percent. LAWA has not deferred formulation of this mitigation measure until a future time. To the contrary, the mitigation measure included in the Draft EIR is specific and includes a measurable performance standard.

Installation of EVSE and EVCS exceeding the requirements of applicable building codes would not induce adoption of electric vehicles and, thus, would not result in directly attributable reductions to the significant Project-related air quality or GHG impacts presented in the Draft EIR. EMFAC2017 v1.0.3 indicates that, in 2020, electric vehicles were expected to account for only 1.2 percent of passenger vehicles (estimated as the total populations of the LDA, LDT1, and LDT2[1] vehicle categories) operating in the Los Angeles (South Coast) region. By Project buildout in 2028, the model estimates that electric vehicles would account for 3.4 percent of the passenger fleet. Even presuming no increase in the existing EVSE and EVCS code requirements, the outfitted spaces that would be required in the Terminal 9 parking facility would exceed expected fleet demand. Therefore, with a 5 percent increase over code requirement, the Terminal 9 parking facility would exceed reasonably foreseeable demand for these spaces.

[1] LDA = Light Duty Automobiles (i.e., passenger cars); LDT1 = Light Duty Trucks 1 (gross vehicle weight rating less than 6,000 pounds and equivalent test weight less than or equal to 3,750 pounds); LDT2 = Light Duty Trucks 2 (gross vehicle weight rating less than 6,000 pounds and equivalent test weight between 3,751 to 5,750 pounds).

ATMP-AL010-159

Comment: MM-AQ/GHG (ATMP)-6: Solar Energy Technology (and corresponding Measure #50 in DEIR Appendix C.9-1) are similarly deficient. These measures call for the installation of building-mounted solar photovoltaic panels and the installation of solar thermal systems for hot water production. DEIR at p. 4.4-32; DEIR, Appendix C.1 at p. C.9-8. These measures fail to commit LAWA to take any action at all. Measure #50 explains that LAWA committed to including four megawatts of solar energy as part of the LAMP; however, as regards the ATMP, it asserts that LAWA would implement solar "where feasible based on costs, grid tie-in capability, environmental clearance, compliance with FAR Part 77, and FAA requirements for land leases and funding as applicable." Id. Consequently, Measure #50, and by association MM-AQ/GHG (ATMP)-6, provide no assurance that solar would in fact be implemented in connection with the ATMP. LAWA has demonstrated the feasibility of solar energy technology by committing to install four megawatts as part of the LAMP; it should commit to installing an equal or greater amount of solar in connection with the ATMP.

Response: Please see Response to Comment ATMP-AL010-160 regarding the nature of the list of measures included in Appendix C.9 of the Draft EIR. With regards to the comments regarding Mitigation Measure MM-AQ/GHG (ATMP)-6, the Draft EIR provides details regarding the criteria for determining the feasibility of this measure. LAWA is already in the process of assessing the feasibility of an on-site energy generation and storage system. A preliminary solar feasibility study was conducted at LAX which indicated the potential capacity for up to 23.5 megawatts (MW). LAWA is committed to continuing to explore ways to feasibly implement this technology in a cost-effective manner. However, until a project-level assessment is completed and approved, it is infeasible to commit to specific targets as part of the proposed Project.

The potential emissions reductions associated with the implementation of solar energy technology in association with the proposed Project were not quantified in the Draft EIR, leading to a conservative finding regarding the significance of Project impacts with respect to air quality emissions after mitigation in Section 4.1.1.5.2.3 of the Draft EIR.

Please also see Topical Response TR-ATMP-AQ/GHG-1 regarding the evaluation of mitigation measures suggested by commenters to address significant air quality and/or GHG impacts.

ATMP-AL010-160

Comment: (b) Additional Potentially Feasible Mitigation Must Be Considered.

The DEIR explains that, in addition to the aforementioned mitigation measures, LAWA has compiled a broad array of additional measures, some of which are already being implemented at LAX under existing LAWA programs, while others would purportedly be incorporated into the ATMP as "Project Features." DEIR at p. 4.1.1-43. The DEIR further states that of the remaining measures, some were considered feasible to add as mitigation measures for the Project, while others were determined to be not applicable

or feasible to include as mitigation for the Project. The DEIR directs the reader to DEIR Appendix C.9 which includes a table of these 93 measures.

A review of these additional measures reveals significant shortcomings. First, measures that either are already part of the Project or that LAWA has already implemented in connection with prior projects are not "mitigation." An EIR must "separately identify and analyze the significance of impacts . . . before proposing mitigation measures." *Lotus v. Dept. of Transportation* (2014) 223 Cal.App.4th 645, 658. When an agency folds discussion of mitigation into discussion of the project and impacts, this "subverts the purposes of CEQA," because it results in omission of "material necessary to informed decisionmaking and informed public participation." Id.; see also *Cleveland II*, 17 Cal.App.5th at 443 (questioning whether measures already incorporated into a project "even qualify as mitigation measures"). Other measures that already exist are reflected in the existing conditions baseline, and by definition cannot avoid or reduce any emissions of the Project.

Response: As the commenter indicates, Appendix C.9 of the Draft EIR identifies and evaluates a broad array of measures which could reduce air quality or GHG impacts. However, this list is not a list of mitigation measures recommended for the proposed Project, as implied by the commenter. Contrary to the commenter's assertions, the measures identified in Appendix C.9 were not "in addition to" the Project's mitigation measures. Rather, as stated on page 4.1.1-43 in Section 4.1.1 of the Draft EIR, the list was compiled to determine if additional measures were applicable as Project mitigation. As acknowledged on page 4.1.1-43 in Section 4.1.1 and on page C.9-1 in Appendix C.9 of the Draft EIR, measures that were already being implemented at LAX under LAWA programs and requirements, and those that were already incorporated into the Project as Project features, were excluded from consideration as mitigation measures.

These 93 measures, presented in Table C.9-1, Review and Screening of Potential Measure for Reduction of Criteria Air Pollutants and Greenhouse Gas Emissions, consider each measure in the context of the proposed Project, identifying if a measure is already implemented under an existing program at LAX, was included as a project design feature, or could be considered as a potentially feasible mitigation measure for the Project. The commenter misconstrues the purpose of Table C.9-1, which does not state or in any way imply that every presented measure would be a project mitigation measure. As labeled, the table provides a review and screening of potential measures that could result in reductions of criteria pollutant or GHG emissions. For the precise reason the commenter states ("measures that already exist are reflected in the existing conditions baseline, and by definition cannot avoid or reduce any emissions of the Project"), the table clearly identifies those measures that were identified as potentially feasible mitigation measures, and those that were determined to not be applicable as mitigation due to their inclusion in existing programs at LAX or in the Project's design features or that were determined to not be applicable or feasible for other reasons.

The evaluation of air quality in the Draft EIR separately identified and analyzed the significance of Project impacts before proposing mitigation. In order to present an accurate reflection of air quality impacts prior to the implementation of recommended mitigation measures, existing programs and policies that may reduce air pollutant

emissions were accounted for in the analysis. These existing programs and policies are identified in Section 4.1.1.2.7 of the Draft EIR. As described in that section, these measures were assumed as part of the air quality analysis, in order that the Project not take credit for them as mitigation. Section 4.1.1.2.7 further divides these existing programs and requirements into those whose benefits could be quantified and those whose benefits could not be quantified.

As demonstrated above, the Draft EIR includes a comprehensive review of potential mitigation measures to ensure that all feasible mitigation measures were identified in the Draft EIR. In accordance with Section 15126.4 of the State CEQA Guidelines, the Draft EIR describes feasible mitigation measures which could minimize significant adverse impacts to air quality. Please see Topical Response TR-ATMP-AQ/GHG-1 for additional information regarding air quality and greenhouse gas mitigation measures for the LAX Airfield and Terminal Modernization Project.

The court of appeal opinion cited in the comment – *Lotus v. Department of Transportation* (2014) 223 Cal.App.4th 645 – is distinguishable. There, the EIR for a highway project did not identify the standard used to determine whether impacts on redwood trees would be "significant," referred to vague "special construction techniques" that were "optional" for the contractor, and provided no information on how these techniques would avoid impacts. Thus, the EIR erred by "compressing the analysis of impacts and mitigation measures into a single issue[.]" (Id. at 656.) In this case, the Draft EIR distinguishes between those measures that are already being implemented, and therefore already incorporated into the air quality analysis, from those that are being considered as mitigation measures, distinguishing between those that are potentially feasible and those that are not.

ATMP-AL010-161

Comment: Moreover, many of the measures that purportedly will be incorporated into the ATMP also fall short of any specific, enforceable commitment to take action. LAWA can and should do more to mitigate the Project's significant air quality impacts. Examples of these deficient measures include the following:

• Measure #4: Ground Support Equipment ("GSE"). This measure calls for LAWA to replace airport sponsor-owned conventionally-fueled equipment with electric or hydrogen-powered counterparts. See DEIR, Appendix C.9-1 at p. C.9-3. Appendix C.9-1 explains that while LAWA does not own or operate GSE it does impose requirements on airlines and GSE operators to reduce emissions at LAX. It also explains that LAWA has adopted the LAX Electric Ground Support Equipment Incentive Program in 2019 with $500,000 from LAWA's own funds to accelerate the use of zero-emission GSE at LAX. Id. The DEIR does not specifically identify or describe the requirements that LAWA currently imposes on airlines and GSE operators nor does it describe the LAX Electric Ground Support Equipment Incentive Program. Accordingly, it is impossible to determine which measures might or might not be incorporated into these requirements or LAX's program, whether those measures are concrete and enforceable, or to what extent any such measures might actually reduce emissions. Nor does the DEIR explain why LAWA caps

its funding at $500,000. LAWA should commit to substantially increasing the amount of funding so as to dramatically increase zero-emission GSE at LAX.

Response: Contrary to the commenter's assertion, the Draft EIR identifies and describes the requirements of the LAX Electric Ground Support Equipment (GSE) program. Specifically, Section 4.1.1 of the Draft EIR describes the policy on page 4.1.1-11 and provides a link in footnote 44 to the policy itself. A link to the policy is also provided in footnote 1 below for ease of reference. As explained in the Draft EIR, in 2015, LAWA adopted the LAX GSE Emissions Policy applicable to all owners and operators of GSE at LAX.[1] The policy set an airport-wide, fleet-average nitrogen oxides plus hydrocarbon (NOx + HC) emission factor target of 2.65 grams per horsepower-hour to be achieved by December 31, 2021. In addition, as discussed on page 4.1.1-26 of the Draft EIR, in December 2019, LAWA entered into a Memorandum of Understanding (MOU) with the SCAQMD to implement specific measures targeting non-aircraft mobile sources at LAX to achieve voluntary emission reductions.[2] The MOU measures are voluntary, quantifiable, and South Coast Ozone State Implementation Plan (SIP)-creditable, and include targets that go above and beyond the requirements of any applicable regulatory scheme.

As explained in Section 4.1.1.3.1.4 of the Draft EIR, the GSE component of the MOU sets airport-wide emission factor targets to be achieved at accelerated rates as compared to existing off-road equipment standards and includes specific targets to be achieved by calendar years 2023 and 2031. This GSE MOU measure has been formally adopted by the City of Los Angeles Board of Airport Commissioners (BOAC) as an update to LAWA's existing GSE policy and would apply to all GSE at LAX, including GSE which would operate at Concourse 0 and Terminal 9.

As described in the adopted GSE policy and the MOU, all GSE operators at LAX would be required to achieve specific fleet-average NOx + HC emission factor targets of 1.8 grams per brake horsepower-hour by January 1, 2023 and 1.0 grams per brake horsepower-hour by January 1, 2031. The GSE program does not prescribe the precise means by which these targets will be met and allows for operator flexibility in achieving the required fleet-average factors, such as the retrofit of existing equipment or equipment turnover to electric, hydrogen-powered, natural gas, low-emission gasoline, or any other alternative fuel equipment. Furthermore, the GSE policy includes interim targets of January 1, 2021 (2.65 grams per brake horsepower-hour, the original 2015 GSE Emissions Policy target) and January 1, 2028 (1.5 grams per brake horsepower-hour) to demonstrate progress towards the MOU targets. If the interim targets are not met, operators are required to provide LAWA with an action plan for reducing the fleet-average factor to the targets that the MOU requires by July 1 of the same year. Furthermore, if an operator fails to achieve MOU targets by their specified dates, the GSE Policy allows LAWA to pursue "…any and all measures and remedies available… including, but not limited to, seeking damages in a reasonable documented amount necessary to offset the GSE operator's failure to reduce emissions, and injunctive relief requiring the non-compliant GSE operator to comply with the Policy."[3]

As noted in the comment, LAWA has set aside $500,000 for its LAX Electric Ground Support Equipment Incentive Program, announced in August 2019.[4] This incentive funding is used to assist GSE owners/operators to replace conventional fueled GSE with

new, 100 percent zero-emission equipment of similar size and type to the conventional fueled equipment being replaced. For purposes of estimating benefits, the analysis in the Draft EIR assumes that the MOU GSE targets for NOx + HC will be met, and the monetary incentive program simply assists in achieving those targets.

Therefore, the GSE emission reductions are assumed to occur irrespective of the proposed Project. Implementation and enforcement of LAWA's GSE policy are both specific and enforceable by LAWA, and can be relied upon to determine the extent that the GSE policy would reduce emissions at the airport.

[1] City of Los Angeles, Los Angeles World Airports, Ground Support Equipment Emissions Policy, last updated October 22, 2019. Available: https://www.lawa.org/-/media/lawa-web/environment/files/lax_gse_emission_reduction_policy_boac.ashx.
[2] Memorandum of Understanding between the South Coast Air Quality Management District and the City of Los Angeles Department of Airports, December 2019. Available: http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/facility-based-mobile-source-measures/mou-la-department-of-airports.pdf?sfvrsn=6.
[3] City of Los Angeles, Los Angeles World Airports, Ground Support Equipment Emissions Policy, last updated October 22, 2019. Available: https://www.lawa.org/-/media/lawa-web/environment/files/lax_gse_emission_reduction_policy_boac.ashx.
[4] City of Los Angeles, Los Angeles World Airports, LAX Electric Ground Support Equipment Incentive Program: Funding Opportunity Announcement & Application Preparation Package, August 2019. Available: https://www.lawa.org/-/media/lawa-web/environment/files/gse-emissions-reduction-program/lax-funding-opportunity-announcement-and-application-preparation-package.ashx.

ATMP-AL010-162

Comment: • Measures #24, #55, #59, #76, and #77 call for using airport-specific sustainable measures including the development of energy-efficient facilities and equipment. See DEIR, Appendix C.9 at pp. C.9-5, C.9-8, and C.9-10. These measures have promising titles but the majority are described in such vague and general terms that they appear to be optional and therefore unenforceable. In particular, Measure #55 calls for "energy-efficient" terminal development projects, including baggage claim delivery areas, automated baggage-handling equipment, public-use corridors to boarding areas, central waiting rooms, restrooms, holding areas, foyers and entryways, and passenger loading bridges while Measure #24 states that development of Concourse 0 and Terminal 9 would achieve LEED Silver. Does this mean that these measures require that all of the facilities and equipment in Concourse 0 and Terminal 9 would achieve LEED Silver? The DEIR does not tell us. Moreover, the DEIR provides inconsistent and contradictory language regarding whether LAWA construction or renovation projects would even have to meet LEED Silver Certification. See DEIR at p. 4.1.1-27, stating that building construction or renovation projects would be required to meet LEED Silver certification, "unless exempted by LAWA's Sustainability Review Committee". Because this measure allows LAWA to exempt a project from meeting LEED Silver Certification, but does not

provide any explanation as to why such exemptions could be given, it does not commit LAWA to take action. Again, given that the Project's air quality and GHG impacts are significant and unavoidable, LAWA can and should do more. LAWA should commit to implementing LEED Platinum certification.

Response: The commenter asserts that Measures #24, #55, #59, #76, and #77 call for using airport-specific sustainable measures including the development of energy-efficient facilities and equipment, appear to be optional and therefore unenforceable. As noted in Response to Comment ATMP-AL010-160, the list of measures included in Appendix C.9 of the Draft EIR is not a list of mitigation measures recommended for the proposed Project. Rather, as stated on page C.9-1 in Appendix C.9 of the Draft EIR, the list represents a broad array of potential measures from which the recommended Project mitigation measures were derived. Therefore, Measures #24, #55, #59, #76, and #77 are not mitigation measures for the proposed Project. Recommended mitigation measures pertaining to air quality are identified in Section 4.1.1.5 of the Draft EIR. If the EIR is certified and the proposed Project is approved and implemented, the mitigation measures identified in the EIR would be incorporated into a Mitigation Monitoring and Reporting Program (MMRP) specific to the proposed Project. The mitigation measures included in the MMRP would not be optional nor unenforceable.

The commenter asserts that the measures in Appendix C.9 are "described in vague…and general terms." This assertion is incorrect. These measures all pertain to green building requirements and certifications covered under LAWA's comprehensive Sustainable Design and Construction Policy. The policy includes requirements for construction projects at LAX to meet or exceed LEED® Silver certifications and LAGBC standards in addition to LAWA's own sustainable design and construction requirements. The policy specifically stipulates that LEED® Silver or better would be required for the "construction of new buildings that are typically occupied, such as terminals, cargo and maintenance facilities, and administrative offices."[1] The policy also acknowledges that the LEED® rating system was not developed specifically for all airport-related projects and exemption from the LEED® Silver certification requirement is allowed where applicable. Even when exempted, the policy requires new construction to meet LAGBC standards and LAWA's own sustainability criteria.[2] Sustainable design and construction requirements are enforced through contractual documents, with sustainable design criteria and specifications reviewed and verified by LAWA staff prior to issuance for bid.[3] As indicated previously, the LEED® rating system was not developed specifically for all airport-related construction. To achieve LEED® certification, a project must earn a certain number of LEED® points, based on number of incorporated sustainability features from a series of curated lists. While some features on these lists are applicable to airport projects, other features are not. Mandating higher levels of LEED® certification without consideration of the applicable LEED® sustainability features would not serve to further reduce significant Project-related air quality or GHG emissions impacts.

The comment that the proposed Project could be exempted by LAWA's Sustainability Review Committee is similar to Comment ATMP-AL010-152; please refer to Response to Comment ATMP-AL010-152. As explained in that response, the commenter mischaracterizes the nature of the measure contained on page 4.1.1-27 of the Draft EIR and ignores the list of proposed Project features in Section 4.1.1.2.7 of the Draft EIR,

specifically, the text on page 4.1.1-20, which clearly states that LAWA would require the design and construction of Concourse 0 and Terminal 9 to achieve LEED® Silver requirements, at a minimum, in accordance with LAWA's adopted the Sustainable Design and Construction Policy and DCH.

[1] City of Los Angeles, Los Angeles World Airports, Sustainable Design and Construction Policy, last updated September 7, 2017. Available: https://www.lawa.org/-/media/lawa-web/tenants411/file/lawa-sustainable-design-and-construction-policy.ashx.
[2] City of Los Angeles, Los Angeles World Airports, Sustainable Design and Construction Policy, last updated September 7, 2017. Available: https://www.lawa.org/-/media/lawa-web/tenants411/file/lawa-sustainable-design-and-construction-policy.ashx.
[3] City of Los Angeles, Los Angeles World Airports, Sustainable Design and Construction Requirements, last updated August 4, 2017. Available: https://www.lawa.org/-/media/lawa-web/tenants411/file/sustainable-design-construction-requirements.ashx.

ATMP-AL010-163

Comment: In short, the DEIR impermissibly leaves a long list of potentially feasible mitigation measures on the table, and thus cannot support the findings CEQA requires. Simply declaring the Project's air quality impacts significant and unavoidable is insufficient. LAWA must do everything it feasibly can to reduce or avoid emissions.

Response: The content of this comment is similar to comments ATMP-AL010-155 through ATMP-AL010-162; please refer to Responses to Comments ATMP-AL010-155 through ATMP-AL010-162. Also see Topical Response TR-ATMP-AQ/GHG-1 regarding the evaluation of mitigation measures suggested by commenters to address significant air quality and/or GHG impacts.

ATMP-AL010-164

Comment: In addition to the enhancements to the mitigation measures discussed above, the revised EIR should include the following mitigation measures to reduce the Project's significant air quality impacts:

• LAWA shall provide El Segundo annually a copy of the emissions inventory LAWA provides annually to SCAQMD. LAWA shall consult with El Segundo and include it as a stakeholder should LAWA and/or SCAQMD propose any new, upgraded and/or additional air quality monitors within El Segundo's municipal boundaries.

Response: Please see Topical Response TR-ATMP-AQ/GHG-1 regarding the evaluation of mitigation measures suggested here, and by additional commenters, to address significant air quality and/or GHG impacts.

ATMP-AL010-165

Comment: • To reduce air pollution emissions at LAX, LAWA has consistently committed to provide ground power at aircraft gates and parking places to eliminate the need for aircraft to operate their auxiliary power units ("APUs") while parked at LAX. It is clear however that certain aircraft gates and parking positions are not currently electrified. See DEIR at 4.1.1-11 identifying the APU operating times for those parking positions that do not have gate power and pre-conditioned air. Consequently, to mitigate for the ATMP's significant air quality impacts, LAWA should adopt the following mitigation measures:

o LAWA shall produce and publish on its website an annual "snapshot" report/map showing the current location of all aircraft gates and parking places in existence at LAX and whether they are currently equipped with ground power and/or pre-conditioned air. As part of this inventory, LAWA shall identify all existing LAX passenger gates (contact and remote), remain all day ("RAD") parking places, remain overnight ("RON") parking places, cargo aircraft loading positions, and maintenance positions and clearly disclose whether each location has or does not have ground power and/or preconditioned air.

o LAWA shall commit to installing ground power to all parking positions that do not yet have such upgrades and LAWA shall identify the schedule for when such power will be installed.

o LAWA shall commit to including preconditioned air at all gates and RON/RAD parking positions, particularly if aircraft using those positions would otherwise need to run their APUs to stay cool/get ready for passengers.

Response: Please see Topical Response TR-ATMP-AQ/GHG-1 regarding the evaluation of mitigation measures suggested here, and by additional commenters, to address significant air quality impacts.

ATMP-AL010-166

Comment: 5. LAWA Must Produce Documents In Response to El Segundo's November 24, 2020 Request Pursuant to the California Public Records Act.

LAWA previously produced an e-mail dated May 1, 2019 from Lijun Sun, SCAQMD, in response to our November 24, 2020 CPRA request. That document includes the following statement: "Attached are South Coast AQMD staff's comments on the Notice of Preparation of an Environmental Impact Report for the Los Angeles International Airport (LAX) Airfield and Terminal Modernization Project (South Coast AQMD Control Number: LAC190404-01)." Please include SCAQMD's comments on the Notice of Preparation for the ATMP in either the revised ATMP EIR or the Final EIR.

Response: The comment letter that the South Coast Air Quality Management District submitted on May 1, 2019 in response to the Notice of Preparation of an Environmental Impact Report for the LAX Airfield and Terminal Modernization Project is included in Appendix A of the Draft EIR. Specifically, the comment letter is provided in Appendix A.3.

ATMP-AL010-167

Comment: LAWA previously produced a memorandum from CDM Smith dated June 19, 2020 in response to our CPRA request. That memorandum states that responses to comments (in connection with the LAX ATMP Final CEQA Protocol for Conducting an Air Quality Impact Analysis of Criteria Air Pollutants) were received from the USEPA, CARB and the SCAQMD. Please include the USEPA's, CARB's, and SCAQMD's comments on the LAX ATMP Final CEQA Protocol for Conducting an Air Quality Impact Analysis of Criteria Air Pollutants in either the revised ATMP EIR or the Final EIR.

Response: The comment that the June 19, 2020 memorandum "states that responses to comments… were received from the USEPA, CARB and the SCAQMD" is not accurate. The memorandum does not state that responses to comments were received from these agencies. Rather, the memorandum states that "the LAX ATMP Final CEQA Protocol for Conducting an Air Quality Impact Analysis of Criteria Pollutants… incorporates responses to comments received" from these agencies. To clarify, the final protocol incorporates LAWA's responses to the comments received from the agencies. It is not necessary to include the comments from these agencies in a revised Draft EIR or in the Final EIR. However, they are included in LAWA's record of proceedings related to the proposed Project. The comments received from USEPA, CARB, and the SCAQMD were provided to the City of El Segundo on or before January 26, 2021 in response to their November 24, 2020 request under the California Public Records Act (CPRA). The files provided to the City of El Segundo included electronic mail messages from the agencies to FAA.

ATMP-AL010-168

Comment: LAWA previously produced an email from Jillian Wong, SCAQMD, dated May 20, 2020 in response to our November 24, 2020 CPRA request. This email states that Ms. Wong intended to send a "formal response with [the SCAQMD's] concerns and comments by the end of the week." Please include the SCAQMD's formal response in either the revised ATMP EIR or the Final EIR.

Response: The SCAQMD's formal response, which consisted of an electronic mail message to FAA, was provided to the City of El Segundo on January 26, 2021 in response to the City's November 24, 2020 CPRA request. It is not necessary to include the response from SCAQMD in a revised Draft EIR or in the Final EIR. However, it is included in LAWA's record of proceedings related to the proposed Project.

ATMP-AL010-169

Comment: LAWA previously produced an email from Michael T. Benjamin, CARB, dated May 20, 2020 in response to our CPRA request. This email states that CARB has "ongoing concerns about the approach being taken [with regard to the air quality modeling protocol] and will be providing a formal response with comments by the end of the week." Please include CARB's formal response in either the revised ATMP EIR or the Final EIR.

Response: CARB's formal response, which consisted of an electronic mail message to FAA, was provided to the City of El Segundo on January 26, 2021 in response to the City's November 24, 2020 CPRA request. It is not necessary to include the response from CARB in a revised Draft EIR or in the Final EIR. However, it is included in LAWA's record of proceedings related to the proposed Project.

ATMP-AL010-170

Comment: E. The DEIR Fails to Adequately Analyze and Mitigate the Project's Climate Change Impacts.

The DEIR's failure to accurately account for and disclose all of the Project's greenhouse gas emissions prejudicially impairs the ability of decisionmakers and the public to understand the Project's cumulative contribution to climate change. The DEIR's conclusion that climate impacts are significant and unavoidable cannot excuse the DEIR's deficiencies. "[A]n EIR's designation of a particular adverse environmental effect as 'significant' does not excuse the EIR's failure to reasonably describe the nature and magnitude of the adverse effect. [Citations.] An adequate description of adverse environmental effects is necessary to inform the critical discussion of mitigation measures and project alternatives at the core of the EIR." *Cleveland National Forest Foundation*, 3 Cal.5th at 514-15. A revised DEIR must be prepared that fully and accurately discloses all of the Project's emissions and its contribution to climate change.

As with other environmental impact categories, the overarching flaw in the DEIR's analysis of climate change impacts is the document's refusal to acknowledge GHG emissions that would clearly be caused by the Project. It fails to account for GHG emissions beyond 2028 despite the fact that the Project will have a lifespan beyond this seven year period. The document also fails to adequately analyze conflicts with state and regional GHG reduction plans and policies and it fails to identify mitigation measures to reduce or avoid the Project's contribution to climate change. The DEIR's approach stands in stark contrast to LAWA's self-touted leadership on climate change issues in the region. See, e.g., LAWA Sustainability Action Plan 2019 at p.1 (claiming that LAWA has "adopted aggressive sustainability targets, invested in green infrastructure, and pushed for carbon neutrality.").[55] LAWA must make substantial modifications to the DEIR's climate change analysis to achieve compliance with CEQA and to affirm its commitment to curbing climate change.

[55] Available at https://cloud1lawa.app.box.com/s/63i2teszgnld5aws68xbou6yc0inl5rp; last accessed February 22, 2021.

Response: As explained in the following responses, the Draft EIR's analysis of greenhouse gas (GHG) emissions complies with CEQA. Please see Topical Response TR-ATMP-G-3 regarding the reasons why 2028 is the appropriate horizon year for evaluating the impacts of the proposed Project. In addition, Topical Response TR-ATMP-G-3 includes, for informational purposes, a general analysis of impacts beyond 2028. With respect to the commenter's assertions that GHG emissions after 2028 would be caused by the proposed Project, please see Section 2.3.1.2.2 of the Draft EIR. As explained there, the annual activity forecast and regression analysis prepared by LAWA's aviation experts determined that aircraft operations would be the same in 2028 with or without the proposed Project, and that the proposed Project would not result in increased aviation and/or passenger activity levels or capacity at LAX. This analysis is supported by substantial evidence as documented in Appendix B.1 of the Draft EIR. Please Topical Response TR-ATMP-G-1 for further discussion of the validity of this forecast. As such, increased GHG emissions associated with future growth in passenger activity and aircraft operations are not the result of the proposed Project.

Section 4.4.5.2 of the Draft EIR addresses the proposed Project's relationship to applicable state, regional, and local plans, policies, and regulations adopted for the purpose of reducing emissions of GHGs. As stated on page 4.4-38 of the Draft EIR, implementation of the proposed Project would increase GHG emissions over baseline levels and would not meet state and local GHG reduction targets (see Table 4.4-7 of the Draft EIR), which would be a significant impact. Section 4.4.5.2.2 of the Draft EIR identifies the mitigation measures that would reduce GHG emissions; however, the GHG impacts would remain significant and unavoidable.

ATMP-AL010-171

Comment: 1. The DEIR Fails to Disclose All Relevant GHG Emissions.

Like all significance determinations under CEQA, "[t]he determination of the significance of greenhouse gas emissions calls for a careful judgment by the lead agency." CEQA Guidelines § 15064.4(a); see also id., § 15064(b) (significance determination "calls for careful judgment . . . based to the extent possible on scientific and factual data"). Where, as here, an agency uses a model or methodology to quantify project emissions, it must support its chosen methodology with substantial evidence, and must "explain the limitations of the particular model or methodology selected for use." Id., § 15064.4(a). CEQA, moreover, requires analysis of the "whole of [the] action" before the lead agency (CEQA Guidelines § 15378(a)) not just isolated components of a project. An EIR's failure to disclose the information CEQA requires, in a manner that deprives the public and decisionmakers with a "full understanding of the environmental issues" raised by a project, is legal error. *Banning Ranch Conservancy v. City of Newport Beach* (2017) 2 Cal.5th 918, 942.

In assessing GHG emissions, an EIR must "reasonably evaluate [the] downstream impacts" of long-range projects that remain in the environment for many years, exerting an influence on travel behavior and emissions. *Cleveland National Forest Foundation*, 3 Cal.5th at 513. This Project—which will influence both aviation activity and regional transportation for decades to come—requires a comprehensive and honest analysis.

Response: The main point of this comment is similar to that of comment ATMP-AL010-170 above. Please see Response to Comment ATMP-AL010-170.

ATMP-AL010-172

Comment: (a) The DEIR Fails to Disclose the Project's Indirect Emissions.

The DEIR fails to provide a full and accurate inventory of the Project's indirect GHG emissions. Rather, the DEIR estimates emissions only from a subset of sources: aircraft, auxiliary power units ("APUs"), ground service equipment ("GSE"), "stationary sources," and motor vehicles. DEIR at p. 4.4-5; DEIR Table 4.4-5 at p. 4.4-29. "Stationary sources" appear to consist only of the boilers used for heating and cooling and for emergency generators. DEIR at p. 4.4-5; DEIR, Appendix C at p. 3-5. The DEIR thus omits from its inventory GHG emissions associated with, at a minimum, electricity, natural gas usage, solid waste disposal, water, usage and wastewater disposal (referred to as "indirect emissions) in the airport's terminals and other facilities. The DEIR omits these "indirect" emissions from both the construction and operational inventories.

Response: As stated on page 4.4-5 in Section 4.4 of the Draft EIR, emissions from "stationary water and space heaters; emergency generators; and indirect [greenhouse gas] GHG emissions from electrical demand" were included in the emissions inventories for operations. Appendix C.2 of the Draft EIR contains detailed calculations for the individual emissions categories. As shown on pages 521 to 523 of the PDF of Appendix C of the Draft EIR, emergency generator emissions were included in the operations emission calculations. Additionally, as shown on pages 524 to 525 of the PDF of Appendix C, emissions from natural gas combustion, landscaping, water usage, and water generation were also estimated from the California Emissions Estimator Model (CalEEMod) and included in the operations emission calculations. The consolidation of these sources into the "stationary" emissions category, which does not exactly match the individual sources discussed in the text, is noted. In response, Tables 4.4-2, 4.4-5, and 4.4-6 of the Draft EIR have been revised to clarify that the references to "stationary sources" on these pages include these sources. This clarification does not require any changes to the GHG emissions inventory, and does not alter the results or conclusions of the GHG analysis. Please see Chapter F3, Corrections and Clarifications to the Draft EIR. Please see Response to Comment ATMP-AL010-173 regarding indirect GHG emissions associated with construction activities.

ATMP-AL010-173

Comment: The DEIR dismisses its obligation to include indirect emissions from the Project's construction activities, stating that they would be speculative and negligible compared to the direct emissions of the construction process. DEIR at p. 4.4-4. The DEIR fails to provide evidentiary support for its statement that these emissions would be speculative and negligible. Moreover, this approach is contrary not only to CEQA but also the guidance set forth by the California Air Resources Board which calls for consideration of indirect emissions so as to provide a more complete picture of the GHG footprint of a facility: "As facilities consider changes that would affect their emissions—addition of a cogeneration unit to boost overall efficiency even as it increases direct emissions, for example—the relative impact on total (direct plus indirect) emissions by the facility should be monitored." DEIR at pp. 4.4-3, 4.4-4. Additionally, the Governor's Office of Planning and Research's guidance for lead agencies conducting GHG analyses in CEQA documents indicates that lead agencies should "make a good-faith effort, based on available information, to calculate, model, or estimate . . . GHG emissions from a project, including the emissions associated with vehicular traffic, energy consumption, water usage and construction activities." DEIR at p. 4.4-4. The revised EIR should include in its construction-related emissions estimates of all indirect sources of emissions.

Response: CEQA requires a reasonable effort to predict the direct and indirect consequences of a proposed project before a project is approved and, therefore, before its actual impacts are known. As defined by CEQA, substantial evidence includes "facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts." (State CEQA Guidelines Section 21082.2.) Both CEQA and the State CEQA Guidelines caution against the use of speculation.[1] As stated on page 4.4-4 of the Draft EIR, indirect emissions associated with construction activities, such as related to purchased electricity, solid waste disposal, water usage, and wastewater disposal, would be speculative and negligible compared to the direct emissions of the construction process. Per the California Air Pollution Control Officers Association, accounting for other indirect (Scope 3) GHG emissions that would occur during the construction lifecycle (e.g., indirect emissions from the manufacture, transport, and end-of-life of construction materials) would also be speculative and is not recommended for inclusion in CEQA documents.[2] Section 4.1.1.2 of the Draft EIR includes a description of the off-road construction equipment, on-road construction equipment, delivery and haul truck trips, and construction worker trips associated with construction of the proposed Project. Sections 4.1.1.2 and 4.4.2.1 of the Draft EIR also explain the parameters used to develop construction GHG emissions from these sources, including the construction schedule, equipment usage, and load factors.

The commenter cites certain text on pages 4.4-3 and 4.4-4 of the Draft EIR that describes guidance set forth by the California Air Resources Board and the Governor's Office of Planning and Research for how to address GHG impacts in CEQA documents; however, none of those citations address how to identify and address indirect emissions associated with construction activities. The GHG analysis provided in the Draft EIR implements the guidance set forth by those agencies, but does not speculate beyond such guidance in attempting to address indirect impacts of construction. Further, as explained on page 4.4-4 of the Draft EIR, the methodology chosen by LAWA to calculate construction GHG impacts is based on The Climate Registry General Reporting Protocol

(GRP) Version 3.0. LAWA, as the lead agency, has discretion in selecting the methodology for analyzing GHG emissions. (State CEQA Guidelines Section 15064.4(c).)

[1] State CEQA Guidelines Section 15144 states "…foreseeing the unforeseeable is not possible…". State CEQA Guidelines Section 15145 states "[i]f, after thorough investigation, a Lead Agency finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact."
[2] California Air Pollution Control Officers Association (CAPCOA), CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act, January 2008. Available: http://www.capcoa.org/wp-content/uploads/downloads/2010/05/CAPCOA-White-Paper.pdf.

ATMP-AL010-174

Comment: The DEIR purports to include indirect GHG emissions in the Project's operational emissions inventory (DEIR at 4.4-5) yet there is no evidence in the DEIR's emissions calculations that such emissions have been included. See DEIR Table 4.4-5; DEIR at p. 4.4-5; DEIR, Appendix C at p. 3-5 (explaining that "stationary sources" consist only of the boilers used for heating and cooling and for emergency generators). If indirect emissions from, for example, electricity, natural gas usage, solid waste disposal, water, usage and wastewater disposal were in fact included in the DEIR's operational emissions estimates, DEIR Table 4.4-6 should have been transparent in its identification of these emissions.

Response: The content of this comment is similar to comment ATMP-AL010-172; please refer to Response to Comment ATMP-AL010-172 regarding indirect GHG emissions from operations.

ATMP-AL010-175

Comment: Because GHG emissions are a cumulative global effect, all sources of a Project's emissions must be included in the inventory. The omission of indirect GHG emissions deprive the public and decisionmakers of information CEQA requires—information necessary to understand and comment meaningfully on the Project's impacts.

Response: Please see Response to Comment ATMP-AL010-172 regarding indirect GHG emissions from operations and Response to Comment ATMP-AL010-173 regarding indirect emissions from construction. As outlined in those responses, the Draft EIR included all quantifiable sources of the proposed Project's GHG emissions and provided the requisite information necessary to understand the Project's impacts.

ATMP-AL010-176

Comment: (b) The DEIR Underestimates Project-related Vehicular Increases in GHG Emissions. As discussed above, the Project will result in a substantially greater increase in VMT than the DEIR discloses. The transportation section is one of the largest sources of greenhouse gas emissions in the United States. In 2018, GHG emissions from transportation accounted for about 28% of total U.S. GHG emissions, making it the largest contributor of U.S. GHG emissions. Between 1990 and 2018, GHG emissions in the transportation sector increased more in absolute terms than any other sector. "Carbon Pollution from Transportation," U.S. EPA.[56] By underestimating VMT, the DEIR also underestimates vehicular GHG emissions. The DEIR should be revised to include an accurate accounting of the Project's GHG emissions resulting from the Project's increase in VMT.

[56] Available at https://www.epa.gov/transportation-air-pollution-and-climate-change/carbon-pollution-transportation; last accessed Feb. 9, 2021.

Response: The commenter's assertions regarding VMT reference previous comments in this comment letter, specifically comments ATMP-AL010-108 and ATMP-AL010-109. Please refer to Responses to Comments ATMP-AL010-227 (which addresses the issues raised in comment ATMP-AL010-108) and ATMP-AL010-109 for a discussion of the accuracy of the VMT estimates used in the Draft EIR. For reasons explained in those responses, the commenter's assertion that the proposed Project would result in a substantially greater increase in VMT than the Draft EIR discloses is incorrect. To assume that VMT (and associated emission) reductions would not occur after implementation of the LAX Landside Access Modernization Program is speculative and there is no basis for ignoring associated benefits of that project in the Draft EIR. Please also see Response to Comment ATMP-AL010-148, which addresses the use of the VMT estimates in air quality analysis. As with the air quality analysis, the GHG emission calculations are consistent with the transportation analysis in Section 4.8 of the Draft EIR and accurately estimate the change in emissions that would occur from changes in VMT and other factors.

ATMP-AL010-177

Comment: (c) The DEIR Incorrectly Incorporates Emission Reductions From LAWA's Policies and Measures In its GHG Emission Calculations.

The DEIR explains that LAWA has included several policies and measures that may reduce GHG emissions in its detailed calculations for the existing conditions and future with Project scenarios. DEIR at pp. 4.4-5, 4.4-6. The DEIR lacks evidentiary support that these policies and measures will in fact be implemented. Consequently, the DEIR should not have assumed emission reductions attributable to these policies and measures in the Project's emissions' inventory. For example, the DEIR assumes emission reductions from the implementation of Tier 4 Final Emission standards (DEIR at p. 4.4-6), yet there is no evidence that Tier 4 will be implemented.

Response: The portion of this comment that pertains to Tier 4 (final) equipment is essentially the same as comment ATMP-AL010-151; please refer to Response to Comment ATMP-AL010-151. Please see Responses to Comments ATMP-AL010-178 and ATMP-AL010-179 below regarding related comments concerning LAWA policies and measures incorporated into the Draft EIR analysis.

ATMP-AL010-178

Comment: Similarly, the DEIR assumes emission reductions from the use of an on-airport concrete batch plant (DEIR at p. 4.4-6), but the DEIR fails to provide evidentiary support that on site rock-crushing operations will occur. DEIR at p. 4.3-31.

Response: The commenter's assertion that the Draft EIR does not provide evidentiary support that an on-site rock crusher would be used during Project construction is incorrect. Mitigation Measure AQ/GHG (ATMP)-1 on page 4.1.1-43 of the Draft EIR specifies that, to the maximum extent feasible, LAWA shall require Project contractors to conduct rock-crushing operations on-site to reuse waste rock/concrete generated during the construction of the Project. The measure defines "maximum extent feasible" as the maximum allowable operation when factoring in the capacity and capability of the rock crusher(s), project schedule, cost, and regulatory conditions. As set forth in Section 1 of LAWA's Design and Construction Handbook (DCH),[1] project contractors are required to comply with the applicable mitigation measures listed in the Mitigation Monitoring and Reporting Program (MMRP) for any project that triggers discretionary action and environmental review under CEQA. Further, as noted in Section 4.1.1.2.7 of the Draft EIR, LAWA has established on-airport concrete batch plants to provide for concrete demand associated with projects at LAX. Moreover, as discussed in Section 4.1.1.3.1.3 of the Draft EIR, LAWA currently holds a Title V permit for stationary sources, issued and enforced by the South Coast Air Quality Management District (SCAQMD), which allows for the operation of on-site stationary sources, which includes up to five concrete batch plants and their associated control equipment and up to five concrete/asphalt crushing plants, subject to certain throughput limits on the combined facilities. For these reasons, contrary to the commenter's assertions, the assumptions in the Draft EIR concerning on-site rock-crushing operations are based on substantial evidence.

[1] City of Los Angeles, Los Angeles World Airports, 2020 Design and Construction Handbook (DCH), Version 1.0, June 30, 2020. Available: https://www.lawa.org/en/lawa-businesses/lawa-documents-and-guidelines/lawa-design-and-construction-handbook.

ATMP-AL010-179

Comment: In other instances, the DEIR identifies policies but does not provide sufficient information to allow the reader to understand how the policy would be implemented, whether it would be effective in reducing emissions, or to verify the amount of emission reduction associated with the policy. For example, the DEIR attributes unspecified emission reductions to a policy calling for reduced APU operating times for gates and

other aircraft parking positions with pre-conditioned air and gate power. DEIR at p. 4.4-6. However, the DEIR does not identify the gates and "other aircraft parking positions" that would purportedly be affected by this policy, the duration of time the APU operating times would be reduced, nor the assumed emission reductions.

Response: The commenter's assertion that the Draft EIR does not provide sufficient information concerning the use of ground power and preconditioned air (PCA), and the associated reduction in auxiliary power units (APU) operating times at Project gates, is incorrect.

Section 4.4.2.3 of the Draft EIR discusses the existing LAWA policies and proposed Project Features that address greenhouse gas (GHG) emissions. Within this section is the policy at issue, which aims to reduce APU operating times. As set forth in Section 7 of LAWA's Design and Construction Handbook (DCH), all new aircraft parking positions at LAX shall be installed with ground power and PCA, where applicable, as coordinated and approved by LAWA. A link to the DCH is provided in Section 4.4.2.3 (on p. 4.4-6). Ground power and PCA are the preferred environmental alternative over conventional APUs. Ground power and PCA are most applicable to commercial aircraft operations, which rely on consistent and reliable power when cargo is being unloaded or passengers are disembarking. Thus, both ground power and PCA would be required to be included at the gates of Terminal 9 and Concourse 0 and would be available for aircraft operations utilizing those gates.

LAWA does not have the authority to mandate the use of ground power and PCA over conventional APUs. However, most major airlines have their own internal requirements for staff to utilize ground power and PCA over APUs where feasible. These requirements stem from the direct cost savings and indirect maintenance savings associated with the utilization of grid power over the conventionally-fueled equipment like APUs.

Section C.8 of Appendix C of the Draft EIR includes the Final CEQA Protocol for Conducting an Air Quality Impact Analysis of Criteria Air Pollutants, which was the basis for developing the emissions estimates presented throughout the Draft EIR. Section 3.2 of this protocol lists the assumptions associated with emissions modeling of aircraft APUs, including the assumed APU operating time (15 minutes per landing and takeoff [LTO]) for gates outfitted with ground power and PCA. Assumptions for APU operating times based on the aircraft body type are also presented (40 minutes per LTO for narrow-body aircraft, 60-minutes per LTO for wide-body aircraft, and 120 minutes per LTO for Airbus 380 series aircraft), which were applied to aircraft parked at cargo gates or remote parking positions that did not have gate power and PCA.

For the reasons outlined above, contrary to the commenter's assertions, the Draft EIR provides sufficient information to allow the reader to understand the policy and modeling assumptions associated with ground power and PCA at new aircraft gates that would be implemented under the proposed Project.

ATMP-AL010-180

Comment: The DEIR's lack of transparency as to how these policies and measures would reduce GHG emissions renders the DEIR's emissions calculations meaningless.

Response: This comment presents a conclusion drawn from comments ATMP-AL010-177, ATMP-AL010-178, and ATMP-AL010-179; please refer to Responses to Comments ATMP-AL010-177, ATMP-AL010-178, and ATMP-AL010-179. As explained therein, the Draft EIR properly incorporates emission reductions from LAWA's Policies and Measures in its GHG emission calculations.

ATMP-AL010-181

Comment: (d) The DEIR's Failure to Estimate or Disclose the Project's Operational Emissions Beyond 2028 Is a Serious Flaw.

As with the approach taken with the document's other environmental impact analyses, the DEIR fails to disclose any Project-related impacts after 2028. This omission—which as discussed above is closely related to the DEIR's failure to consistently and accurately describe when Project "buildout" occurs—both deprives the public and decisionmakers of information necessary to a full understanding of the Project's impacts, and divests the DEIR's significance conclusions of evidentiary support.

By truncating the analysis at 2028, the DEIR fails to reckon with the growth in aviation activity—and GHG emissions—that will undoubtedly occur as a result of the Project. The need for an objective analysis that extends beyond 2028 is not an academic exercise. Although the DEIR determines that the Project would result in a nominal increase in overall GHG emissions, it concludes that the Project would actually result in a reduction in aircraft-related GHG emissions. See DEIR at p. 4.4-30, Table 4.4-6. The DEIR attributes this decrease in aircraft emissions to the increased efficiency of the airfield with Project implementation. DEIR at p. 4.4-30. While the Project may improve airfield efficiency, and this increased efficiency may result in a reduction in GHG emissions over the short term, the increase in aviation activity that will result from the overall Project beyond 2028 would almost certainly result in a substantial increase in GHG emissions.

The DEIR evaluates the Project's emissions compared to 2018 Baseline Conditions and determines that there would be a 23% increase in aircraft emissions between 2018 and 2028. See DEIR at p. 4.4-29, Table 4.4-5. The DEIR explains that this increase in aircraft activity between 2018 and 2028 is projected to occur irrespective of the proposed Project. DEIR at p. 4.4-29. Yet, had the DEIR carried its analysis through the year 2045 (recognizing that aviation activity will increase to accommodate the 50 percent increase in passenger demand between 2018 and 2045) and analyzed the increase in GHG emissions that would accompany these increased activity levels, it would have determined that the Project would cause an increase, not a decrease in aircraft emissions.

Aircraft constitute a huge portion of an airport's emissions. According to a report prepared by the Center for Biological Diversity ("CBD"), aircraft carbon polluting is skyrocketing:

Greenhouse gas emissions from the aviation sector are a substantial contributor to global warming. If the aviation industry were a country, it would place sixth in emissions, between Japan and Germany. Left unchecked global aviation will generate an estimated 43 metric gigatons of carbon dioxide emissions through 2050, constituting almost 5% of the global emissions allowable to keep global warming below 1.5 degrees Celsius. In the United States, aircraft are one of the fastest-growing sources of emissions: Emissions from domestic aviation alone have increased 17% since 1990, to account for 9% of greenhouse gas emissions from the U.S. transportation sector. Flights departing from airports in the United States and its territories are responsible for almost one-quarter of global passenger transport-related carbon emissions, the majority of which come from domestic flights.

"Airplane Emissions," Center for Biological Diversity.[57]

By omitting 27 years of emissions, the DEIR substantially underestimates the Project's GHG emissions and thus fails to provide the public with a meaningful assessment of the Project's impact on climate change.

The DEIR's failure to analyze impacts beyond 2028 also makes it impossible to comprehensively evaluate the Project's conflict with Executive Order S-3-05. EO S-3-05 establishes specific emissions reduction goals and guides state climate policy through 2050. The DEIR determines that the Project conflicts with the Executive Order, stating that GHG emissions in 2028 with Project implementation would be approximately 7.3% higher than baseline (2018) conditions. DEIR at p. 4.4-35. Yet, this is not the meaningful level of analysis CEQA requires. In order to provide a meaningful evaluation of the Project's consistency with EO S-3-05, the DEIR must begin its analysis by estimating the Project's emissions in 2050. We point out additional deficiencies in the DEIR's analysis of consistency with EO S-3-05 below.

For the reasons discussed above, the DEIR should be revised to analyze impacts through at least 2050.[58]

[57] Available at https://www.biologicaldiversity.org/programs/climate_law_institute/transportation_and_g lobal_warming/airplane_emissions/; last accessed Feb. 9, 2021).
[58] Analyzing impacts through 2050 would also be closer to the guidance from the SCAQMD which identifies a project's lifetime as 30 years. DEIR at p. 4.4-4.

Response: Please see Topical Response TR-ATMP-G-3 regarding the reasons why 2028 is the appropriate horizon year for evaluating the impacts of the proposed Project. Please also see Section 2.3.1.2.2 of the Draft EIR. As explained there, the annual activity forecast and regression analysis prepared by LAWA's aviation experts determined that aircraft operations would be the same in 2028 with or without the proposed Project, and that

the proposed Project would not result in increased aviation and/or passenger activity levels or capacity at LAX. This analysis is supported by substantial evidence as documented in Appendix B.1 of the Draft EIR. Please Topical Response TR-ATMP-G-1 for further discussion of the validity of this forecast. As such, increased greenhouse gas (GHG) emissions associated with future growth in passenger activity and aircraft operations are not the result of the proposed Project.

Table 4.4-7 of the Draft EIR includes an analysis of whether implementation of the proposed Project would conflict with Executive Order S-3-05. As indicated in the table, the statewide GHG reduction targets for California include reducing GHG emissions to 1990 levels by 2020, and reducing GHG emissions to 80 percent below 1990 levels by 2050. The impacts discussion in Table 4.4-7 of the Draft EIR acknowledges that the Project's increase in GHG emissions above baseline levels may conflict with the State's ability to achieve statewide GHG reduction targets, which, along with other state and local GHG reduction targets, is the basis for concluding that the proposed Project would result in a significant impact. The Project's GHG emissions in 2028, at Project buildout, are already disclosed in the Draft EIR as being greater than GHG emissions in 1990 and are, therefore, found to be significant. Based on that, one could conclude that the Project GHG emissions would not achieve the target to reduce GHG emissions to 80 percent below 1990 levels; hence, the significance conclusion would not change.

Notwithstanding the fact that 2028 is the appropriate horizon year for evaluating the impacts of the proposed Project, as discussed in Topical Response TR-ATMP-G-3, that topical response includes, for informational purposes, an evaluation of impacts in 2033. As described therein, the difference in total GHG emissions in 2033 with the proposed Project compared to without the Project would be less than one percent. As such, one could conclude that looking beyond 2028, the Project's GHG emissions would not be below 1990 levels, let alone 80 percent below 1990 levels.

Regarding footnote 58 that is included as part of the comment, the 30-year timeframe that is noted on page 4.4-4 of the Draft EIR pertains to the amortization of construction emissions, as stated in the Draft EIR as well as in the South Coast Air Quality Management District's (SCAQMD's) Draft Guidance Document - Interim CEQA Greenhouse Gas (GHG) Significance Threshold (see Footnote 15 on page 4.4-4 of the Draft EIR). Neither the Draft EIR nor the subject SCAQMD guidance document state or suggest that one should use that 30-year timeframe to speculate as to a project's operations-related GHG emissions at the end of a project's assumed lifespan if different from the emissions estimated for project buildout.

ATMP-AL010-182

Comment: F. The DEIR Fails to Provide a Legally Defensible Analysis of the Project's Conflicts with Applicable Plans, Policies, and Regulations Adopted for the Purpose of Reducing the GHG Emissions.

1. Executive Orders S-3-05, B-30-15, B-55-18, and the 2017 Climate Change Scoping Plan

The DEIR determines that the Project would conflict with Executive Orders S-3-05, B-30-15, and B-55-18, and the 2017 Climate Change Scoping Plan. DEIR at p. 4.4-35. Yet, rather than provide a meaningful analysis which would allow decisionmakers and the public to understand the extent of these conflicts, the DEIR offers the following perfunctory explanation with regard to each of these directives: "GHG emissions in 2028 with Project implementation would be approximately 7.3 percent higher than baseline (2018) emissions." See DEIR at p. 4.4-34, Table 4.4-7. There are several flaws with the DEIR's purported impact analysis. First, the DEIR fails because it does not analyze the Project's emissions through the target years established by these Executive Orders.[59]

[59] Executive Order S-3-05 calls for reducing GHG emissions to 80 percent below 1990 levels by 2050; Executive Order B-30-15 establishes a statewide GHG reduction target of 40 percent below 1990 levels by 2030; Executive Order B-55-18 establishes a statewide GHG reduction target of carbon neutrality by 2045; and the 2017 Climate Change Scoping Plan sets a statewide strategy to achieve a statewide GHG reduction target of 40 percent below 1990 levels by 2030. DEIR at p. 4.4-35.

Response: As discussed above in the Response to Comment ATMP-AL010-181 relative to Executive Order S-3-05, the GHG emissions associated with the proposed Project at buildout in 2028 would be above baseline levels, which is already disclosed in the Draft EIR as being above the GHG emission reduction targets specified in that Executive Order. The same is true relative to Executive Orders B-30-15 and B-55-18, as well as the 2017 Climate Change Scoping Plan. The Draft EIR indicates that the proposed Project's GHG emissions in 2028 would be approximately 7.3 percent higher than 2018 baseline levels, which is sufficient to easily discern that it would conflict with the GHG reduction target of the various milestone years that call for emissions to be at, or 40 to 80 percent below, 1990 levels, or be carbon neutral by 2045. Such conflicts are identified in the Draft EIR as being a significant and unavoidable impact of the proposed Project.

ATMP-AL010-183

Comment: Second, by simply proclaiming that the Project's emissions would exceed baseline emissions, the Project fails to determine the severity and extent of the Project's inconsistency with these state directives. Other agencies have adopted the Executive Orders as thresholds of significance for long-term projects, including Regional Transportation Plans. For example, in 2015 SANDAG used them as a threshold of significance in the EIR for its 2015 RTP/SCS. Specifically, that EIR asked whether the project would "[b]e inconsistent with the State's ability to achieve the Executive Order B-30-15 and S-3-05 goals of reducing California's greenhouse gas emissions to 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050." See Final Environmental Impact Report for San Diego Forward: The 2015 Regional Plan, adopted on October 9, 2015 at p. 4.8-19.[60]

In its RTP/SCS EIR, SANDAG evaluated the RTP/SCS's impacts by calculating a 40 percent and 80 percent reduction from the region's 1990 emissions and using those figures as a target reference point for the RTP/SCS. It then compared the region's expected GHG

emissions in the years 2035 and 2050 to the emissions necessary to meet the Executive Orders' trajectories. It included charts showing that the RTP/SCS would not come close to meeting the Executive Orders' goals. It concluded that because the total emissions in the San Diego region of 25.5 MMT CO2e in 2035 would exceed the regional 2035 GHG reduction reference point of 14.5 MMT CO2e (which is based on Executive Order-B-30-15 and Executive Order S-3-05), the RTP/SCS's 2035 GHG emissions would be inconsistent with state's ability to achieve the Executive Orders' GHG reduction goals and that this inconsistency constituted a significant impact. It SANDAG demonstrated it is feasible to conduct a meaningful analysis of a project's consistency with the state's directives adopted for the purpose of reducing GHG emissions. The ATMP DEIR should be revised to conduct an analysis that demonstrates the nature and extent of the Project's inconsistency with California's climate change goals.

[60] Available at https://sdforward.com/pdfs/EIR_Final/FinalEnvironmentalImpactReport-completedocument.pdf; last accessed Feb. 22, 2021.

Response: Contrary to the commenter's assertion, Section 4.4.5.2 of the Draft EIR addresses the Project's consistency with applicable plans, policies, or regulations adopted for the purpose of reducing the emissions of GHGs and identifies conflicts with these plans, policies, and regulations as a significance threshold. Specifically, pages 4.4-35 and 4.4-38 analyze the proposed Project's consistency with the Executive Orders, and address the Project in the context of the State's ability to achieve the Executive Order targets. Each lead agency has broad discretion to select appropriate technical methods for analyzing GHG emissions, including analyzing consistency with plans and policies, such as the Executive Orders. (See State CEQA Guidelines Section 15064.4(a).) Additionally, lead agencies have discretion to adopt thresholds of significance as appropriate for individual projects, provided that substantial evidence supports the threshold. (See State CEQA Guidelines Sections 15064(b)(2) and 15064.7.) As discussed below, the Draft EIR's approach to this analysis, including the chosen threshold of significance, was reasonable, and the commenter's suggested approach is not appropriate for the proposed Project.

The basic nature of the SANDAG 2015 RTP/SCS project and associated GHG emissions characteristics are substantially different from those of the proposed LAX Airfield and Terminal Modernization Project. The SANDAG 2015 RTP/SCS provides a countywide regional plan that comprehensively addresses growth, transportation, land use and development patterns, and sustainability strategies anticipated to occur through 2035 and, ultimately, 2050. The LAX Airfield and Terminal Modernization Project is a specific development project particular to LAX with completion planned to occur in 2028. The specific "reference point" approach to determining Executive Order consistency used in the SANDAG EIR may be appropriate for a long-term comprehensive regional plan with many sources of GHG emissions (being more similar to a statewide emissions inventory) and as associated with the long-term growth anticipated to occur in the regional plan (i.e., the "Project" being addressed in the SANDAG EIR), but it clearly is not appropriate for a shorter-term specific project with only a few sources of GHG emissions that would be fully actualized at Project buildout (i.e., 2028 for the LAX Airfield and Terminal

Modernization Project) and which are accounted for as such in the Draft EIR impacts analysis. Additionally, it is important to note that the implementation aspects of Executive Orders B-30-15 and S-3-05 are specific to, and limited to, state agencies and not individual development projects such as the LAX Airfield and Terminal Modernization Project. The Executive Orders instruct those state agencies to develop plans, strategies, and measures to reduce GHG emissions statewide, but those instructions do not provide any specifics on how the State is supposed to achieve those reductions. As with the AB 32 Scoping Plan, nothing in the Executive Orders relates the statewide reduction efforts to "the percentage of reduction that would or should be required from individual projects." (See *Center for Biological Diversity v. California Department of Fish and Wildlife* (2015) 62 Cal.4th 205, 225-226.) As such, it is not meaningful to provide an analysis of how the proposed Project's GHG emissions would compare to speculative, hypothetical "fair share" project-specific emission reductions under the Executive Orders. Similarly, adopting the quantitative GHG emissions reduction targets of the executive orders as thresholds of significance would not be meaningful in performing the qualitative consistency analysis in Section 4.4.5.2 of the Draft EIR. It is more meaningful to analyze, as the Draft EIR did, whether the GHG emissions associated with the Project would or would not be consistent with the State's ability to achieve the Executive Orders' GHG reduction targets. Section 4.4 of the Draft EIR provides estimates of the Project's construction and operations GHG emissions and describes (on pages 4.4-35 and 4.4-38) why those GHG emissions would not be consistent with the State's ability to achieve the Executive Order GHG reduction targets; therefore, the Draft EIR considers these GHG impacts to be significant.

ATMP-AL010-184

Comment: Third, the DEIR attempts to dismiss its obligation to conduct a thorough analysis when it asserts that statewide GHG reduction targets are not directly applicable to individual projects. DEIR at p. 4.4-35. The DEIR includes no explanation as to why individual projects should be exempt from a consistency determination with state and GHG reduction plans. We query why the DEIR would set forth a significance threshold calling for this analysis, only to ignore it. Moreover, the CEQA Guidelines instruct the lead agency to determine "[t]he extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions." CEQA Guidelines § 15064.4 (b)(3). Finally, common sense dictates that individual projects—and especially large scale projects such as the ATMP—must be held accountable for their roles in achieving or interfering with GHG reduction goals.

Response: Please see Response to Comment ATMP-AL010-183 regarding the applicability of various Executive Orders with statewide emission reduction goals to individual projects. As discussed in that response, the Draft EIR included an appropriately qualitative analysis of the proposed Project's consistency with applicable plans, policies, or regulations adopted for the purpose of reducing the emissions of GHGs, including State and other GHG reduction plans.

ATMP-AL010-185

Comment: The DEIR should be revised to provide a legally defensible analysis of the Project's consistency with regional and state plans adopted for the purpose of reducing GHG emissions.

Response: Please see Response to Comment ATMP-AL010-183 regarding the Draft EIR's analysis of whether the proposed Project would conflict with regional and state plans adopted for the purpose of reducing GHG emissions.

ATMP-AL010-186

Comment: 2. SB 375 and SCAG's RTP/SCS

The DEIR determines that the Project would not be inconsistent with SB375 and SCAG's 2020-2045 RTP/SCS suggesting that LAX's activity levels are within the activity levels identified for LAX in the 2020-2045 RTP/SCS. DEIR at p. 4.4-35. In particular, the DEIR claims that the activity levels are forecasted to be 127.9 MAP for LAX by 2045 whether or not the proposed Project is implemented. Here too, the DEIR has not provided the evidentiary support that the Project would not be inconsistent with the most recent RTP/SCS. Again, as an initial matter, the DEIR should have analyzed the ATMP's emissions in 2045, not just the activity levels projected for LAX in that year. In 2018, CARB issued per capita reduction targets for the SCAG region of 8% by 2020 and 19% by 2035. DEIR at pp. 4.4-16, 4.4-19. The DEIR should be revised to evaluate how the region will achieve these goals in light of the emission increases resulting from the ATMP.

Response: Section 2.3.1.2 of the Draft EIR discusses future growth projected to occur at LAX. Section 2.3.1.2.1 describes the Southern California Association of Governments (SCAG) regional aviation activity forecast and Section 2.3.1.2.2 describes the LAWA LAX aviation activity forecast. As indicated on page 2-17 of the Draft EIR, the LAWA forecast projected passenger levels at LAX for each year between 2018 and 2045, while the SCAG forecast projected future passenger levels for only 2045; however, both forecasts had essentially the same projection for LAX in 2045, with SCAG's projection being 127 million annual passengers (MAP) and LAWA's projection being 127.9 MAP. That comparison provides the basis to conclude that the LAX aviation activity forecast prepared by LAWA is consistent with the LAX aviation activity forecast prepared by SCAG which, in turn, supports the validity of the passenger activity level projected for 2028 – the buildout horizon year for the LAX Airfield and Terminal Modernization Project. While the discussion on page 2-17 goes on to state that the passenger activity levels projected for 2028 would be the same with or without the proposed Project, based on substantial evidence provided in Appendix B.1 of the Draft EIR, nowhere in the Draft EIR or the related appendices is there the claim "that the activity levels are forecasted to be 127.9 MAP for LAX by 2045 whether or not the proposed Project is implemented," as asserted by the commenter. Please see Topical Response TR-ATMP-G-1 for further discussion of the validity of the Draft EIR's aviation forecast.

Regarding the commenter's assertion that the Draft EIR should have analyzed the proposed Project's emissions in 2045, please see Topical Response TR-ATMP-G-3 regarding the reasons why 2028 is the appropriate horizon year for evaluating the impacts of the proposed Project.

ATMP-AL010-187

Comment: 3. Sustainable City pLAn/Green New Deal

Los Angeles Mayor Eric Garcetti's Green New Deal is an ambitious update to the city's first-ever Sustainable City pLAn (2015).[61] The Green New Deal sets a commitment to the Paris Climate Agreement to drive down GHG emissions by placing Los Angeles on the road to a zero-carbon future. Specifically, the Green New Deal sets targets of reducing municipal GHG emissions below 2008 levels by 55% by 2025 and 65% by 2035, reaching carbon neutrality by 2045. Id.

The DEIR determines that the Project would be inconsistent with the Sustainable City pLAn and the Green New Deal (DEIR at p. 4.4-36), but similar to the approach taken within regard to the Executive Orders, it does not evaluate the severity and extent of these inconsistencies. The EIR should be revised to include a detailed evaluation of the Project's inconsistencies with these important plans.

[61] Mayor Garcetti's Green New Deal (available at https://plan.lamayor.org/sites/default/files/pLAn_2019_final.pdf; last accessed Feb. 9, 2021).

Response: As discussed on page 4.4-38 in Section 4.4 of the Draft EIR, "…GHG emissions at LAX in 2028 would be greater than the GHG emissions in 2018, which themselves are greater than 1990 GHG emissions levels." (See also Draft EIR, page 4.4-36 in Table 4.4-7). As compared to LAX's existing emissions in 2018, construction and operation of the proposed Project would result in LAX's GHG emissions in 2028 being 9.5 percent higher than existing conditions (see Table 4.4-5 on page 4.4-29 of the Draft EIR). While a direct comparison to 1990 emissions is not readily available, because emissions in 2028 after Project implementation would increase compared to existing emissions, it can be inferred that emissions would similarly be higher than 1990. Because the GHG emission reduction goals in the Green New Deal and the Sustainable City pLAn are city-wide targets, it would be too speculative to determine how the Project-specific GHG emissions increase would affect the City's ability to meet its emissions reduction goals because that would be affected by activities that are outside of LAWA's control, including the anticipated contributions and reductions from other City departments.

The GHG emission reduction goals discussed in the Green New Deal and the Sustainable City pLAn are city-wide emission reduction targets and are not applicable to individual projects such as the LAX Airfield and Terminal Modernization Project. Additionally, it should be noted that the single greatest source of GHG emissions associated with operation of the proposed Project at buildout in 2028 is from aircraft, and the greatest

increase in GHG emissions at LAX at Project buildout compared to existing conditions in 2018 is also from aircraft – see Table 4.4-5 in the Draft EIR. As stated on page 4.4-31 of the Draft EIR, LAWA does not have the authority to regulate aircraft operations or emissions from aircraft engines. Additionally, as discussed in Section 2.3.1.2.1 of the Draft EIR, the growth in aircraft activity at LAX projected to occur by 2028, compared to existing (2018) baseline conditions, would occur even if the Project was not implemented. As such, the primary contributor to increased GHG emissions at LAX in the future is beyond the authority of LAWA and is also beyond the authority of the City of Los Angeles, which should be taken into consideration in evaluating whether implementation of the proposed Project meets the Green New Deal and the Sustainable City pLAn target to "Reduce *municipal* (emphasis added) emissions 55% by 2025 and 65% by 2035 from 2008 baseline levels, reaching carbon neutral by 2045."

However, by acknowledging that the proposed Project would cause an increase in emissions compared to baseline conditions, the Draft EIR sufficiently demonstrates that the proposed Project would not be consistent with the emission targets set forth in the Green New Deal and the Sustainable City pLAn. However, while emissions would increase, LAWA has been proactively working to reduce its GHG emissions through numerous policies and proposed Project features, which are further discussed in Section 4.4.2.3 on pages 4.4-5 to 4.4-7 of the Draft EIR. LAWA is committed to achieving the GHG emission reduction goals established by the City and has incorporated these targets into its Sustainability Action Plan. As discussed on pages 4.4-21 and 4.4-22 of the Draft EIR, LAWA is actively working to reduce its GHG emissions through various programs, including the LAX Alternatives Fuel Vehicle Incentive Program, the Zero-Emission Bus Program, and other measures contained in the LAWA Sustainable Design and Construction Policy. Furthermore, Appendix C.9 of the Draft EIR provides a list of 93 potential criteria pollutant and GHG emission reduction measures that were reviewed during preparation of the Draft EIR. A new paragraph on page 4.4-38 of the Draft EIR has been inserted immediately before the concluding paragraph of Section 4.4.5.2.1 to include a discussion of the proposed Project's consistency with these plans. Please see Chapter F3, Corrections and Clarifications to the Draft EIR.

The standards governing recirculation of a Draft EIR are identified in Section 15088.5 of the State CEQA Guidelines. The information provided in the response to this comment, and the text added to the Draft EIR, merely clarifies and amplifies information that already appeared in the Draft EIR. For this reason, they do not meet the criteria that require preparation and recirculation of a revised Draft EIR.

ATMP-AL010-188

Comment: 4. LAWA Sustainability Plans and Guidelines
LAWA's Sustainability Plans and Guidelines identify an internal commitment to reduce GHG emissions from LAWA owned and operated sources 45% below 1990 levels by 2025, 60% by 2035, and 80% by 2050. LAWA's Sustainability Action Plan ("SAP") increases these goals to a 55% reduction below 1990 levels by 2025, 65% reduction by 2035, and carbon neutrality by 2045. DEIR at p. 4.4-37. The DEIR determines that the Project would not be inconsistent with these Plans and Guidelines because the Project would achieve

LEED Silver certification, the airfield improvements would meet LAWA's Sustainable Design Requirements and because Terminal 9 and Concourse 0 would have pre-conditioned air and gate power. Id. The DEIR lacks the evidentiary basis to conclude the Project would not be inconsistent with LAWA's Plans because it makes no attempt to determine whether the Project would be consistent with the airport's Sustainability Action Plan's emission reduction goals. Moreover, as discussed above, the DEIR lacks evidentiary support that the Project would meet the LEED Silver standard.

Response: LAWA's sustainability plans and guidelines include numerous key targets and airport-wide implementation actions, one component of which is a commitment to reduce GHG emissions from LAWA owned and operated sources 55 percent below 1990 levels by 2025, 65 percent by 2035, and carbon neutrality by 2045 (see page 4.4-21 of the Draft EIR). However, the sustainability plans and guidelines do not require this emission reduction to be achieved on individual projects. Additionally, the consistency analysis performed in Section 4.4.5.2 of the Draft EIR is qualitative, rather than quantitative, because the GHG emissions impact significance threshold adopted by LAWA (Impact 4.4.2) is qualitative. The Draft EIR also includes a quantitative analysis of the Project's GHG emissions (Impact 4.4-1) and concluded that the impact would be significant and unavoidable. With respect to the qualitative analysis under Impact 4.4-2, as identified on pages 4.4-21 and 4.4-22 in Section 4.4 of the Draft EIR, LAWA has adopted a number of plans and programs that relate to sustainability, including the Sustainable Design and Construction Policy; the SCAQMD MOU, which includes a GSE Emission Reduction Policy, LAX Alternative Fuel Vehicle Incentive Program, and Zero-Emission Bus Program; the Design and Construction Handbook; and the LAWA Employee Rideshare Program. As discussed on page 4.4-37 in Section 4.4 of the Draft EIR, the proposed Project would be required to be comply with these plans and programs. Among these requirements, as stated on page 4.4 7 in Section 4.4 of the Draft EIR, Concourse 0 and Terminal 9 would be required to achieve LEED® Silver requirements, at a minimum, in compliance with the Sustainable Design and Construction Policy. Because this is an existing LAWA requirement, no further evidence is required to support the assertion that the Project would meet the LEED® Silver standard. For additional information, please see Response to Comment ATMP-AL010-187.

ATMP-AL010-189

Comment: G. The DEIR's GHG Mitigation Measures Fail to Satisfy CEQA's Standards.

1. The Measures Discussed in the DEIR Are Impermissibly Vague and Unenforceable.

The DEIR relies on many of the same mitigation measures to purportedly mitigate the Project's air quality and GHG significant impacts. Set forth below is a summary of the deficiencies with the DEIR's approach to measures intended specifically to address the Project's significant GHG emissions.

Response: Please see Responses to Comments ATMP-AL010-190 through ATMP-AL010-192 below. These responses outline the details and enforceability of each mitigation measure raised

in this section of the comment letter. As explained therein, the Draft EIR's GHG mitigation measures comply with CEQA.

ATMP-AL010-190

Comment: MM-GHG (ATMP)-3 calls for LAWA to develop and adopt an airport-wide Green Procurement Policy which "shall identify requirements and standards for products or services that have a lesser or reduced effect on human health and the environment when compared with competing products or services that serve the same purpose." DEIR at p. 4.4-32. This measure is vague and non-specific and therefore fails to commit LAWA to specific, enforceable actions that will reduce or avoid Project emissions to the extent feasible. As discussed above, CEQA allows mitigation to be deferred but only if there is a reason or basis for the deferral and the measures contain specific performance standards that will be met. *San Joaquin Raptor Rescue Ctr. v. County of Merced* (2007) 149 Cal.App.4th 645, 669-71. Here, the DEIR contains no rationale for why it is necessary to defer the development of this green policy, nor does it include any performance standards. In addition, the DEIR makes no attempt to correlate the Green Procurement Policy to GHG emission reductions.

Response: The commenter's assertion that MM-GHG (ATMP)-3 would defer development of an airport-wide Green Procurement Policy is incorrect. As stated on page 4.4-32 in Section 4.4 of the Draft EIR, "LAWA shall develop and adopt an airport-wide Green Procurement Policy applicable to LAWA purchasing which will apply to the Airfield and Terminal Modernization Project." LAWA has, in fact, progressed in framing the specifics of the Green Procurement Policy. It is currently anticipated that LAWA's future Green Procurement Policy will:

- Be adopted by 2022 as directed in LA Sanitation & Environment (LASAN's) Zero Waste Plan for City Hall, City-sponsored and Permitted Events and City Departments;
- Align with the City's Environmental Preferred Purchasing policies and practices, including complying with the requirements in Ordinance No. 180751 and related ordinances;
- Require products and services to be verified by a reputable independent certification party such as Green Seal, Forest Stewardship Council or International Organization for Standardization (ISO) to ensure manufacturer's claims are true.
- Prioritize selecting products that are:
  - Durable and long-lasting;
  - Made with recycled content, non-toxic and sustainable materials;
  - Comes with minimal packaging;
  - Conserve energy and water use, and reduce greenhouse gas and air pollution; and
  - Support local manufacturers and vendors.
- Support Extended Producer Responsibility (EPR) initiatives and mandates

The mitigation measure further states that the policy would "identify…products or services that have a lesser or reduced effect on…the environment when compared with competing products or services…" Because this policy would be applied to the proposed Project, it in no way defers mitigation. GHG emissions are inherent in the use of products

and services. Green Procurement policies are a recognized tool for reducing GHG emissions.[1, 2, 3] By identifying and mandating the use of products or services that would have a reduced effect on the environment when compared to existing products, GHG emissions associated with LAWA operations, including operations associated with the proposed Project, would be reduced. Identifying specific performance standards would be speculative because data on these products are not currently available and, therefore, potential emission reductions associated with the Green Procurement Policy were not quantified in the Draft EIR.

[1] U.S. Environmental Protection Agency, Managing Supply Chain Greenhouse Gas Emissions: Lessons Learned for the Road Ahead, December 2010. Available: https://www.epa.gov/sites/production/files/2015-07/documents/managing_supplychain_ghg.pdf.
[2] CoolCalifornia.org, Green Purchasing Homepage. Available: https://coolcalifornia.arb.ca.gov/article/buy-green-0, accessed May 16, 2021.
[3] Hasanbeigi, A., Becque, R., and Springer, C., Curbing Carbon from Consumption: The Role of Green Public Procurement, Global Efficiency Intelligence, August 2019. Available: https://www.climateworks.org/wp-content/uploads/2019/09/Green-Public-Procurement-Final-28Aug2019.pdf.

ATMP-AL010-191

Comment: MM-GHG (ATMP)-4 has the potential for substantial emission reductions yet the measure is vague and directory. It calls for enhancing LAWA's existing recycling program but it does not describe the agency's existing program nor does it describe how the program would be expanded. See DEIR at p. 4.4-32 (merely calling for an expansion of the number of facilities in the program). Similarly the measure calls for updating the agreement requiring tenant diversion goals, but it does not describe the existing tenant diversion goals or explain how these goals would be updated. Relatedly, MM-GHG (ATMP)-2 calls for LAWA to require "waste reduction procedures" at Concourse 0 and Terminal 9. DEIR at p. 4.4-32. Here too, the DEIR does not describe LAWA's Waste Collection Program, other than to state that it is a voluntary program. Id.

Response: Recycling of existing waste materials at LAX is governed by City Ordinance 181519, and by LAWA's Construction & Maintenance Recycling Division. LAWA has operated a recycling program since the early 1990s. The program includes: in-house collection of recyclable materials generated by LAWA and from common-use recycling containers and bins in airport terminals and airfield areas; collection of materials from airlines and tenants through individual agreements at no cost to participants; coordinating with airlines' and tenants' own recycling programs and reporting of data to LAWA; and source reduction through the purchase of recycled products and reuse of materials.[1][2] MM-GHG (ATMP)-4 describes how the existing recycling program would be expanded. As stated on page 4.4-32 in Section 4.4 of the Draft EIR, MM-GHG (ATMP)-4 includes "expanding the number of facilities in the program (including Concourse 0 and Terminal 9)." Thus, the existing recycling program would be expanded to include Concourse 0 and Terminal 9. The mitigation measure's requirements to update tenant diversion goals and

to incorporate provisions from the Green Procurement Policy (see MM-GHG (ATMP)-3) also define the recycling program's expansion. Similarly, MM-GHG (ATMP)-2 would require operations at Concourse 0 and Terminal 9 to follow the procedures in the organic waste collection program, which is otherwise voluntary. Through that program, food waste is collected from kitchens and service areas, transported to an off-site facility, and converted into natural gas using anaerobic digestion.[3]

[1] City of Los Angeles, Los Angeles World Airports, LAWA Environmental Overview: LAX Construction & Maintenance Services, Recycling Program Homepage. Available: https://www.lawa.org/lawa-environment/environmental-programs-group/lawa-lax-recycles, accessed May 16, 2021.
[2] City of Los Angeles, Los Angeles World Airports, LAWA Sustainability Action Plan, 2019. Available: https://www.lawa.org/en/lawa-sustainability.
[3] City of Los Angeles, Los Angeles World Airports, LAWA Sustainability Action Plan, 2019. Available: https://www.lawa.org/en/lawa-sustainability.

ATMP-AL010-192

Comment: Both MM-GHG (ATMP)-2 and MM-GHG (ATMP)-4 would appear to have tremendous potential to reduce GHG emissions (and divert a substantial amount of landfill waste), but in order to achieve emission reductions, the measures must be significantly strengthened. LAWA should follow the lead of San Francisco International Airport ("SFO") and adopt a Zero Waste Plan that requires SFO to reduce or eliminate the use of non-renewable materials and to recycle or compost all eligible materials. SFO Zero Waste Plan: A roadmap to reduce, recapture, recycle and reinvent SFO's Material System.[62] The goals of SFO's Zero Waste Plan is to divert at least 90% of waste from landfills and incinerators by 2021. SFO's program has the potential to be very successful. In Fiscal Year 2015-16, SFO generated 12,200 tons, or 26,888,800 pounds, of solid waste. A recent study confirmed that more than 95% of this waste was compostable or recyclable. Id.

[62] Available at https://www.flysfo.com/sites/default/files/media/sfo/community-environment/13259_Zero_Waste_Roadmap.pdf; last accessed Feb. 9, 2021.

Response: As discussed in LAWA's Sustainability Action Plan,[1] LAWA is currently developing a Zero Waste Plan. The Sustainability Action Plan also outlines goals to achieve a 25 percent non-construction waste diversion rate by 2025 and a 50 percent rate by 2035. Additionally, LAWA has a goal to achieve a 90 percent construction waste diversion rate by 2025 and a 95 percent rate by 2035. Because LAWA is actively working towards adopting a Zero Waste Plan, which may include source reduction, expanded recycling, and organic waste reduction components, the suggested revision to the mitigation measure included in the Draft EIR is not required. Additionally, see Response to Comment ATMP-AL010-191 for discussions of the adequacy of MM-GHG (ATMP)-2 and MM-GHG (ATMP)-4. Please also see Topical Response TR-ATMP-AQ/GHG-1 regarding

the evaluation of mitigation measures suggested by commenters to address significant air quality and/or GHG impacts.

[1] City of Los Angeles, Los Angeles World Airports, LAWA Sustainability Action Plan, 2019. Available: https://www.lawa.org/en/lawa-sustainability.

ATMP-AL010-193

Comment: 2. Additional Potentially Feasible Mitigation Must Be Considered.

The DEIR acknowledges that the Project's increase in GHG emissions would result in significant impacts, even with mitigation. Similar to the approach taken with respect to the air quality mitigation measures, the DEIR states that LAWA compiled and reviewed a broad array of potential measures that could reduce the Project's GHG emissions. The DEIR refers the reader to DEIR Appendix C.9, explaining that certain of these measures are already being implemented at LAX or would be implemented as part of the ATMP as Project features.

Response: Please see Responses to Comments ATMP-AL010-194 and ATMP-AL010-195 below. These responses discuss the feasibility of each mitigation measure raised in this section of the comment letter. Also see Topical Response TR-ATMP-AQ/GHG-1 regarding the evaluation of mitigation measures suggested by commenters to address significant air quality and/or GHG impacts.

ATMP-AL010-194

Comment: Of the remaining measures, some were considered feasible to add as mitigation measures while others were determined to be infeasible. DEIR at p. 4.4-33. A review of these additional measures reveals that LAWA likely has the authority to implement measures that it has determined to be infeasible.

For example, Measure #32 calls for the creation of a carbon offset strategy. DEIR, Appendix C at p. C.9-6. The DEIR asserts that the FAA has taken the position that any use of funds by LAWA absent a specific regulatory requirement is prohibited by revenue diversion policies (id.) yet the DEIR does not explain the nature of this prohibition. The DEIR refers to an FAA policy which apparently pertains to the use of airport revenues but the document does not describe this policy nor does it explain how the policy would prohibit LAWA from creating a carbon offset policy. In addition, the DEIR does not explain why LAWA could not simply adopt a regulation calling for the establishment of a carbon offset program.

Response: As stated on page C.9-6 of Appendix C.9 of the Draft EIR, purchasing offsets by LAWA absent a specific regulatory requirement is prohibited by the FAA's revenue diversion policies.[1] As stated in the cited Federal Register notice, "[p]ayments of impact fees must meet the general requirement that airport revenue be expended only for actual

documented costs of items eligible for use of airport revenue under this Policy Statement." Moreover, the policy is consistent with the "statutory prohibition [in 49 U.S.C. Sections 47107, subd. (b) and 47133] on payment of airport revenues that do not reflect the value of services or facilities actually provided to the airport." As such, while airport revenue may be used for environmental mitigation measures, they may only be used when funding an airport development project that would otherwise be eligible for use of the airport revenue. Because the purchase of offsets would not be required by a specific regulatory action and would not be used to purchase something that would otherwise be eligible for airport revenue, the purchase of offsite carbon offsets would be prohibited. LAWA could also not attempt to circumvent this restriction by adopting its own regulation to establish a carbon offset program because it would still be restricted from using its revenue to purchase offsets per the described FAA policy.

[1] U.S. Department of Transportation, Federal Aviation Administration, Policy and Procedures Concerning the Use of Airport Revenue at Section VI(B)(10),64 Fed. Reg. 7696, 7720 (1999). Available: https://www.govinfo.gov/content/pkg/FR-1999-02-16/pdf/99-3529.pdf.

ATMP-AL010-195

Comment: Measure #34 calls for LAWA to develop an airport expansion and development GHG emission policy. See DEIR, Appendix C at p. C.9-6). The DEIR refers to this measure as an "Existing Program" yet it also states that LAWA does "not currently have a formal, adopted policy specific to greenhouse gas emissions but that it does have several other programs and requirements that serve to reduce or minimize greenhouse gas emissions within its control." Id. Given that GHG emissions from the aviation sector are a substantial contributor to climate change, we query why LAWA cannot adopt a policy or program specific to GHG emissions. A cornerstone of such a program could be an emission offsets program.

Response: As acknowledged by the commenter, LAWA has several existing programs and requirements that serve to reduce or minimize GHG emissions within its control. LAWA's individual programs, such as the LAX Air Quality Improvement Measures (AQIM),[1] the Sustainability Action Plan,[2] sustainability requirements in the Sustainable Design & Construction Requirements,[3] and the LAWA Design and Construction Handbook[4] (see page C.9-6 in Appendix C.9 of the Draft EIR) already require feasible reductions in GHG emissions from sources within LAWA's control, including GHG emissions from airport-owned or controlled sources (e.g., Scope 1 GHG emissions from airport-owned vehicles and stationary sources such as boilers for heating) and indirect emissions from the consumption of energy at airport facilities (Scope 2 GHG emissions). The majority of GHG emissions associated with the proposed Project, however, would occur from aircraft, which LAWA does not own and whose emissions LAWA has no authority to control (i.e., Scope 3 GHG emissions). It would, therefore, not be possible to adopt a policy with the intended purpose of reducing GHG emissions from aircraft or other sources outside of LAWA's control. Thus, the effectiveness of any new GHG emission policy would be speculative and would not necessarily reduce GHG emissions beyond

what is required by LAWA's existing programs. Please see Response to Comment ATMP-AL010-194 for a discussion of the feasibility of an emission offsets program.

[1] Relevant LAX AQIM Measures are included and referred to as "MOU Measures in Attachment A of the Memorandum of Understanding between the South Coast Air Quality Management District and the City of Los Angeles Department of Airports, December 2019. Available: http://www.aqmd.gov/docs/defaultsource/clean-air-plans/air-quality-management-plans/facility-based-mobile-source-measures/mou-ladepartment-of-airports.pdf?sfvrsn=6.
[2] City of Los Angeles, Los Angeles World Airports, LAWA Sustainability Action Plan, 2019. Available: https://cloud1lawa.app.box.com/s/63i2teszgnld5aws68xbou6yc0inl5rp.
[3] City of Los Angeles, Los Angeles World Airports, Los Angeles International Airport Sustainable Design & Construction Requirements, August 4, 2017. Available: https://www.lawa.org/-/media/lawaweb/tenants411/file/sustainable-design-construction-requirements.ashx.
[4] City of Los Angeles, Los Angeles World Airports, 2020 Design and Construction Handbook (DCH), Version 1.0, June 30, 2020. Available: https://www.lawa.org/en/lawa-businesses/lawa-documents-and-guidelines/lawa-design-and-construction-handbook.

ATMP-AL010-196

Comment: Notwithstanding the mitigation measures identified in the DEIR, the Project's GHG impacts remain significant and unavoidable. LAWA has a duty to consider other feasible mitigation measures as it may not lawfully approve the Project without considering additional, feasible mitigation to reduce or avoid the Project's significant climate change impacts.

Response: The content of this comment is related to comments ATMP-AL010-194 and ATMP-AL010-195; please refer to Responses to Comments ATMP-AL010-194 and ATMP-AL010-195. Also see Topical Response TR-ATMP-AQ/GHG-1 regarding the evaluation of mitigation measures suggested by commenters to address significant air quality and/or GHG impacts.

ATMP-AL010-197

Comment: H. LAWA Must Look Out at Least 20 Years and Submit a Master Plan Amendment to the ALUC for Consistency Review.

In describing the role of Airport Land Use Commissions, California Public Utilities Code section 21675(a) provides, in relevant part: "The commission's airport land use compatibility plan shall include and shall be based on a long-range master plan or an airport layout plan, as determined by the Division of Aeronautics of the Department of Transportation, that reflects the anticipated growth of the airport during at least the next 20 years." California Public Utilities Code section 21676(c) provides, in relevant

part: "Each public agency owning any airport within the boundaries of an airport land use compatibility plan shall, prior to modification of its airport master plan, refer any proposed change to the airport land use commission."

The DEIR briefly discusses the project's consistency with the LA County Airport Land Use Plan (DEIR at p. 4.6-5) and acknowledges that the Project must be presented to the ALUC for a determination regarding whether the project is consistent with the LA County Airport Land Use Plan (DEIR at p. 2-86). The DEIR does not, however, acknowledge or comply with LAWA's obligation to update its long-range Master Plan for LAX to reflect anticipated growth of the airport during at least the next 20 years.

In the years since adoption of the 2004 Master Plan for LAX, that plan has become increasingly irrelevant, as LAWA has abandoned many Master Plan elements and modified others through the pursuit of various stand-alone projects. LAX is long overdue for a Master Plan update. Rather than preparing a comprehensive Master Plan update, however, LAWA has adopted a piecemeal approach to airport planning similar to that seen in the era before the 2004 Master Plan. The Project is just the latest example of this approach. In the absence of a complete Master Plan, the public and ALUC cannot understand the full extent of likely growth at LAX. Moreover, by failing to look out at least 20 years, LAWA violates both state law regarding ALUC review and CEQA.[63]

[63] Moreover, LAWA's piecemeal approach creates costly project coordination problems. Even LAWA seemed to acknowledge the problem with that approach in its recent RFP for a "Principal Engineer/Architect" team to "advance the planning and design" of the Project, which sought applicants with significant airport master planning experience. See Exhibit 2, BOAC Dec. 10, 2020 Agenda Item 14 Staff Report.

Response: The California Public Resources Code does not require LAWA to prepare a long-range Master Plan for LAX. Moreover, the commenter's assertion that, in the absence of a complete Master Plan, LAWA violates state law regarding ALUC review is incorrect. As cited by the commenter, Section 21675(a) of the California Public Utilities Code states that the land use compatibility plan "shall be based on a long-range master plan *or an airport layout plan* that reflects the anticipated growth of the airport during at least the next ten years" (emphasis added). LAWA regularly updates its Airport Layout Plan (ALP) for approval by FAA. The current ALP was approved by FAA on January 17, 2020.[1] The ALP identifies existing facilities as well as planned future facilities. Section 21675 does not require an airport operator to prepare a Master Plan or to speculate on future development at an airport. Similarly, CEQA does not require an EIR to engage in speculation or to look beyond reasonably foreseeable events. As required by Section 15064(h)(1) of the State CEQA Guidelines, the Draft EIR considered probable future projects in its evaluation of cumulative impacts. The list of projects considered in the cumulative impacts analysis, which is provided in Table 3-1 of the Draft EIR (as modified in Chapter F3, Corrections and Clarifications to the Draft EIR, to include an additional project at LAX), includes over ten projects and multi-component development programs at LAX, some of which are not anticipated to be completed for almost 15 years. By including a comprehensive list of reasonably foreseeable future projects, the Draft EIR evaluated the full extent of likely growth at LAX. There is no evidence to suggest that

LAWA has impermissibly "piecemealed" analysis of the proposed Project. Please see Topical Response TR-ATMP-G-3 regarding the reasons why 2028 is the appropriate horizon year for evaluating the impacts of the proposed Project.

[1] City of Los Angeles, Los Angeles World Airports, Airport Layout Plan – Existing Layout Plan Sheet, January 17, 2020.

ATMP-AL010-198

Comment: I. The DEIR Fails to Adequately Analyze and Mitigate the Project's Energy Impacts.

An EIR must include a "detailed statement" setting forth, among other things, "measures to reduce the wasteful, inefficient, and unnecessary consumption of energy." Pub. Resources Code § 21100(b)(3). Appendix F to the CEQA Guidelines contains a "list of energy impact possibilities and potential conservation measures" that lead agencies should consider if "applicable or relevant" to the project for which an EIR is prepared. CEQA Guidelines, App. F, § II. EIRs must quantify the energy impacts of proposed projects, and must consider specific measures to reduce those impacts. *California Clean Energy Committee v. City of Woodland* (2014) 225 Cal.App.4th 173, 211-212; *Ukiah Citizens for Safety First v. City of Ukiah* (2016) 248 Cal.App.4th 256, 264-65.

The DEIR's discussion of operational energy impacts is flawed. As previously discussed, the DEIR's assertion that aviation activity at the airport would grow at exactly the same rate with or without the Project is misleading. Accommodating additional growth in air travel by removing existing constraints will foreseeably lead to greater aviation fuel consumption, which must be addressed in the DEIR. Because the DEIR fails to account for all aviation fuel usage caused by the Project, or to propose mitigation for this potentially significant impact, it fails to comply with Appendix F. See *California Clean Energy Committee*, 225 Cal.App.4th at 212.

Response: The Draft EIR's analysis of energy impacts complies with CEQA. Impacts of the proposed Project with respect to energy are addressed and quantified in Section 4.3 of the Draft EIR, including energy consumption related to electricity (Tables 4.3-3 and 4.3-4), natural gas (Table 4.3-5), and mobile source and transportation-related fuels (Tables 4.3-2 and 4.3-6). As identified in Section 4.3, impacts to energy would be less than significant; therefore, no mitigation measures are required. However, in accordance with Appendix F of the State CEQA Guidelines, both Chapter 2 and Section 4.3 of the Draft EIR list a number of existing LAWA requirements with respect to energy conservation and identify Project features that would reduce energy use associated with the proposed Project. In particular, see Table 2-3 for a listing of proposed Project sustainability features, which include a wide range of measures that would reduce the Project's energy consumption. In addition, Section 4.3 identifies mitigation measures that are proposed for the purpose of reducing air pollutant and greenhouse gas (GHG) emissions and that would have a positive effect on energy efficiency, or directly or indirectly reduce energy consumption.

Future consumption of jet fuel associated with aircraft operations in 2028 was addressed and quantified in the Draft EIR (Section 4.3.5.1.2 and Table 4.3-6). With respect to the commenter's assertions that this analysis is flawed because the Draft EIR makes incorrect assumptions about future growth and constraints at LAX, please see Section 2.3.1.2.2 of the Draft EIR. As explained there, the annual activity forecast and regression analysis prepared by LAWA's aviation experts determined that aircraft operations would be the same in 2028 with or without the proposed Project, as documented in Appendix B.1, and that the proposed Project would not result in increased aviation and/or passenger activity levels or capacity at LAX. Please also see Topical Response TR-ATMP-G-1 for further discussion of the validity of this forecast.

ATMP-AL010-199

Comment: J. The DEIR Fails to Properly Analyze or Mitigate the Project's Hazards to the Public and the Environment.

An EIR must analyze whether a project would create a significant hazard to the public or the environment from the routine transport, use or disposal of hazardous materials or from reasonably foreseeable upset and accident conditions involving the release of hazardous materials. See CEQA Guidelines, Appendix G.IX. Here, the Project would increase the risk of hazards to the surrounding community by relocating undisclosed "hazardous materials" from their current location in Air Freight Building No. 8, to a new, undisclosed location on the LAX premises, potentially in close proximity to residential areas and sensitive receptors.

The DEIR states that due to the construction of proposed Terminal 9, LAWA would have to demolish and relocate a portion of Air Freight Building No. 8 to a new, undisclosed site on the airport. DEIR, Table 2-4, row 28. Currently, the 70,891-square-foot building and adjacent area is used by various tenants for cargo operations, GSE support, hazardous materials storage, and aircraft/maintenance/overhaul support. Id. Construction of Terminal 9 would require relocating at least 15,000 square feet of the current site to a new location or consolidating the affected uses in the remaining structure. Id. However, LAWA does not indicate any potential site where the building/uses would be relocated. Nor does the DEIR disclose what these hazardous materials are or the risk they pose to nearby communities. The failure to include any of this information in the DEIR, even if the ultimate relocation site is not yet known, violates CEQA.

Furthermore, El Segundo has serious concerns that LAWA would relocate these uses to an empty site adjacent to El Segundo residences. Although the DEIR discusses the proposed demolition/relocation of Air Freight Building No. 8 as an "enabling project" for Terminal 9, it is clear that this would be specifically for the proposed Taxiway C extension (see Part III). When LAWA previously proposed the Taxiway C extension in 2012, LAWA stated that some or all of Air Freight Building No. 8 would have to be demolished/relocated. LAWA proposed relocating the affected uses to a site directly across Imperial Highway from El Segundo (see aerial photo below).

[See original comment letter for figure.]

LAWA may not relocate any of the current uses at Air Freight Building No. 8, including but not limited to hazardous materials storage, to any site adjacent to El Segundo without disclosing this plan to the public or conducting an environmental review of this relocation. As things stand now, LAWA cannot rely on the DEIR for any relocation of the building/uses. Under CEQA, LAWA must evaluate all environmental impacts of moving some or all of Air Freight Building No. 8 to a new site/existing facility, and any potential alternative sites/facilities, including but not limited to noise, light, hazardous materials, and transportation impacts caused by an intensification of existing use. El Segundo moreover urges LAWA not to propose or approve relocating these uses to the aforementioned site, or any other site adjacent to El Segundo.[64]

[64] Furthermore, with the exception of the proposed Southwest Airlines GSE facility relocation (DEIR, Table 2-4, row 7), LAWA has not done any of the CEQA analysis that would be needed to support locating any facilities as part of the Project to sites along Imperial west of Sepulveda. LAWA cannot rely on the DEIR for any such relocation. With regard to the proposed Southwest Airlines GSE relocation, El Segundo requests that LAWA commit not to select "Option 1" or "Option 2" for the proposed relocation of the GSE facility, as shown at DEIR Figure 2-27.

Response: The Draft EIR's analysis of hazards and hazardous materials complies with CEQA. As stated in Table 2-4 in Chapter 2 of the Draft EIR, a portion of Air Freight Building #8 would be demolished as part of Project implementation, but a majority of the building is anticipated to remain. As discussed in the table, there are two potential options for the existing uses in Air Freight Building #8: existing uses would either be consolidated within the remaining portion of the building, or they would be relocated to other facilities at LAX. Whether or not any of the existing uses would need to be relocated has not been determined. It is possible no relocation would be required. Moreover, if any of the existing activities were to require relocation, the specific activities or uses that would be relocated have not been identified, nor has a relocation site or sites been selected. Therefore, the assertion that implementation of this enabling project would increase the risk of hazards to the surrounding community by relocating hazardous materials currently housed in Air Freight Building #8 is speculative. In accordance with CEQA, an indirect physical change which is speculative is not reasonably foreseeable and does not need to be considered in the environmental analysis. (See State CEQA Guidelines Section 15064(d)(3).)

The fact that LAWA previously considered a different project that would require the demolition and relocation of Air Freight Building #8 has no relationship to the proposed Project. If implementation of the proposed Project were to require the relocation of any of the activities or uses in Air Freight Building #8, LAWA would identify a suitable relocation site and conduct environmental review prior to implementation, if necessary.

ATMP-AL010-200

Comment: K. The DEIR Fails to Adequately Analyze and Mitigate the Project's Aesthetic Impacts. LAWA does not evaluate the Project's impacts on aesthetics in the DEIR, based on its conclusion in the NOP that there would be no such impacts. See DEIR at p. 6-7. Nonetheless, we take this opportunity to convey El Segundo's frustration with the poor aesthetic quality of LAWA's property on LAX's southern boundary, adjacent to El Segundo.

These photos of the existing street view along Imperial Highway and California Street between LAX and El Segundo illustrate the poor aesthetic quality of airport property on the southern boundary:

[See original comment letter for figure.]

[See original comment letter for figure.]

[See original comment letter for figure.]

These aesthetic/landscape conditions are far inferior to what LAWA maintains at other locations around the airport and do not satisfy LAWA's own prior commitments with respect to landscaping and aesthetics.

For example, these excerpts from LAWA's MMRP for the LAX Master Plan illustrate LAWA's longstanding promise to provide landscaping and other aesthetic improvements in order to be a better neighbor to El Segundo and others. LAWA has not lived up to those promises, but must make that a priority now before investing in new facilities, including the Project.

LAX MASTER PLAN ALTERNATIVE D
MITIGATION MONITORING & REPORTING PROGRAM

	Master Plan Commitments/ Mitigation Measures	Potential Impact Being Addressed	Timing of Implementation	Monitoring Frequency	Actions Indicating Compliance
	Design, Art, and Architecture Applications / Aesthetics				
DA-1 Monitoring Agency: LAWA	**Provide and Maintain Airport Buffer Areas.** Along the northerly and southerly boundary areas of the airport, LAWA will provide and maintain landscaped buffer areas that will include setbacks, landscaping, screening or other appropriate view-sensitive improvements with the goals of avoiding land use conflicts, shielding lighting, enhancing privacy and better screening views of airport facilities from adjacent residential uses. Use of existing facilities in buffer areas may continue as required until LAWA can develop alternative facilities.	Avoidance of view degradation	Prior to approval of development plans for projects abutting residential and view sensitive uses along the northern & southern boundaries of airport by LAWA	Once, during plan review on a project-by-project basis	Provision of landscape buffer areas, to the extent feasible, in the development and landscape plans

LU-4 Monitoring Agency: LAWA	Neighborhood Compatibility Program. Ongoing coordination and planning will be undertaken by LAWA to ensure that the airport is as compatible as possible with surrounding properties and neighborhoods. Measures to enforce this policy will include. 1) Along the northerly and southerly boundary areas of the airport, LAWA will provide and maintain landscaped buffer areas that will include setbacks, landscaping, screening or other appropriate view sensitive uses with the goal of avoiding land use conflicts, shielding lighting, enhancing privacy and better screening views of airport facilities from adjacent residential uses. Use of existing facilities in buffer areas may continue as required until LAWA can develop alternative facilities. 2) Locate airport uses and activities	Land use incompatibility with nearby residential uses	Throughout Master Plan development	On-going throughout Master Plan development	Compliance with the provisions of the LAX Zone/LAX Specific Plan and LAX Plan

Area: Land Use 7

LAX MASTER PLAN ALTERNATIVE D
MITIGATION MONITORING & REPORTING PROGRAM

Master Plan Commitments/ Mitigation Measures		Potential Impact Being Addressed	Timing of Implementation	Monitoring Frequency	Actions Indicating Compliance
LU-4	(Cont'd) with the potential to adversely affect nearby residential land uses through noise, light spill-over, odor, vibration and other consequences of airport operations and development as far from adjacent residential neighborhoods as feasible. 3) Provide community outreach efforts to property owners and occupants when new development on airport property is in proximity to and could potentially affect nearby residential uses.				

LAWA must rectify this existing problem by immediately developing and implementing adequate landscaping plans for its southern boundary, adjacent to El Segundo.

Response: The comment is noted and will be included in the Final EIR for consideration by the decision-makers prior to taking any action on the LAX Airfield and Terminal Modernization Project. LAX Master Plan Commitment DA-1, cited by the commenter, applies to projects abutting residential and view-sensitive uses along the northern and southern boundaries of LAX. The proposed Project is not located along the northern or southern boundaries of LAX and would not abut residential and view-sensitive uses along these boundaries. LAX Master Plan Commitment DA-1, also cited by the commenter, applies to the LAX Northside project. Therefore, development and implementation of landscaping plans for the southern boundary of LAX do not apply to the proposed Project.

ATMP-AL010-201

Comment: VI. The DEIR Must Be Revised and Recirculated to Meet CEQA's Requirements of Adequate Disclosure of Impacts and Adequate Opportunity for Public Review.

The environmental impacts of LAX and the proposed Project are massive. The plans for the airport's future should undergo detailed and accurate review, including full disclosure to the public and decisionmakers and an opportunity to for the public to comment and be heard. For the reasons detailed in this letter and the attachments/exhibits, the DEIR fails to provide adequate disclosure and mitigation of significant environmental impacts. Additional analysis must be prepared to meet legal standards and adequate documents must be recirculated to the public for review and comment.

Conclusion

For the reasons set forth above, we respectfully request that no further consideration be given to the proposed Project until an EIR is prepared and circulated that fully complies with CEQA.

Response: The commenter's opinion about the proposed Project impacts is noted and will be included in the Final EIR for consideration by the decision-makers prior to taking any action on the LAX Airfield and Terminal Modernization Project. The Draft EIR provides a detailed and accurate review that fully discloses the impacts associated with the LAX Airfield and Terminal Modernization Project. The public comment period for the Draft EIR was extended twice, for a total comment period of 138 days, providing ample opportunity for the public to comment on the document. Responses to the specific comments raised in this letter are provided in Responses to Comments ATMP-AL010-1 through ATMP-AL010-200 and ATMP-AL010-202 through ATMP-AL010-318.

The LAX Airfield and Terminal Modernization Project Draft EIR is complete, adequate, and meets the requirements of CEQA. In preparing the Final EIR for the proposed Project, LAWA has reviewed all of the comments received, the comments identified above, and has carefully considered the responses to these comments and other information provided in the LAX Airfield and Terminal Modernization Project Final EIR. None of the information provided in the Final EIR meets the criteria for recirculation of an EIR as outlined in Section 15088.5 of the State CEQA Guidelines.

ATMP-AL010-202

Comment: Introduction

This review of the DEIR for the LAX Airfield and Terminal Modernization Project focuses on the analysis of traffic growth forecast and its relation to the airfield and gate system improvements in the project. While no attempt is made to question the socioeconomic assumptions underlying the overall demand forecasts, it should be noted that these forecasts were made prior to the onset of the current pandemic. While recovery in the aviation system is not unknown and recognized in the preamble to the DEIR, the long-term effects of this pandemic on the behavior of the aviation system and on the socioeconomic factors driving aviation demand are not well understood yet. Some of the changes being witnessed today in work habits, commerce and social activities may become long lasting if not permanent. These changes will likely alter the relation between factors such as GDP growth and air travel demand. Likewise, recent changes in airlines fleets, such as the accelerated retirement of very large aircraft will alter the relation between aircraft operations forecast and passenger traffic forecasts, and relation between airfield and landside operational capacities. These recent changes are not reflected in what is essentially a post-pandemic forecast. This review is therefore only focusing on the consistency of the analysis within the assumptions of its forecasts as documented in the DEIR, and in particular on the possible impact of the improvements in this project on growth in aircraft operations and in passenger traffic.

The review finds that the DEIR does not adequately assess the traffic growth impacts caused by the improvements in question.

Response: This comment is an introduction to a comment letter prepared by Professor Kanafani and included as Attachment A of the comment letter submitted by Shute, Mihaly & Weinberger LLP on behalf of the City of El Segundo.

In this introduction, the commenter correctly states that the forecasts prepared to support the LAX Airfield and Terminal Modernization Project Draft EIR were developed prior to the emergence of the COVID-19 global pandemic in early 2020. As discussed in the first paragraph of the preamble to Appendix B.1 of the Draft EIR, the unconstrained activity forecasts, constrained demand scenario, and associated operational analyses were the result of a planning process that concluded in October 2019.

In the following sentences of this introductory paragraph, the commenter summarizes his opinions on the potential effects of the COVID-19 global pandemic on "the behavior of the aviation system and on the socioeconomic factors driving aviation demand". The commenter concludes that his review and comments on the Draft EIR focused on "consistency of the analysis with the assumptions of its forecasts" and "possible impact of the improvements in this project on growth in aircraft operations and in passenger traffic."

Please see Topical Response TR-ATMP-G-1 for information regarding the uncertainties associated with the anticipated post-COVID-19 global pandemic recovery.

In a concluding statement, the commenter asserts that the Draft EIR does not adequately assess the [aviation] traffic growth impacts caused by the LAX Airfield and Terminal Modernization Project improvements. Please refer to Responses to Comments ATMP-AL010-203 through ATMP-AL010-207 for responses on each comment provided by the commenter to support this concluding statement.

ATMP-AL010-203

Comment: Traffic Forecasting Issues

The project is based on forecasts of traffic at LAX with an unconstrained and a constrained growth scenario. The unconstrained forecast is based on socioeconomic projections for the LA Basin and projects compound annualized growth rates (CAGR) of 2.2% for passengers and 1.1% for aircraft operations. This projection is based on an assumed 80% share for LAX of the basin's total traffic. The constrained forecast is based on the assumption that as airport capacity is approached, as reflected by annualized average delay reaching 15 minute per operation, growth will slow down to defer the onset of delays in such a way that annualized average delay reaches 18 minutes by 2045. The constrained forecast results in CAGR growth rates of 1.5% for passengers and 0.7% for operations. [see Appendix B.1, Exhibit 4-2] In both scenarios, the faster growth of passenger traffic compared to operations reflects assumed changes in aircraft fleets, primarily through the increases in seating capacities of aircraft such as B737's and

A320's. These increases are evidenced by recent airline aircraft orders documented in the DEIR.

The slowdown in traffic growth in the constrained forecast is assumed to begin in 2029. This assumption is based on the results of capacity simulations that show the capacity of 833,000 annual operations to be reached in 2031, and the assumption that airlines begin to adjust their schedules and fleet choices and to reduce operations approximately 2 years before the onset of the 15-minute delay that defines capacity. Constrained growth is assumed to continue in such a way that the annual average delay reaches 18 minutes in 2045 with 853,000 annual operations.

This total operations forecast for 2045 is then converted to passenger traffic (MAP) using the three operational assumptions based on observed trends at the airport, as described in section 4.4.4 of Appendix B:

1. Percent of operations that are scheduled passenger service = 90%
2. Average Load Factor = 90%
3. Average seats per departure = 190

The resulting constrained MAP forecast shown in Table 4.1 of Appendix B does not reflect these assumptions correctly. For example, the Table 4.1 estimates passenger traffic in 2045 at 127.9 MAP, when the correct number with the stated assumptions should be 131 MAP. (853,000x0.9x0.9x190 = 131,000,000). Furthermore, it is curious that the DEIR assumes and average 190 seats per departure in 2045 under the constrained scenario while using the figure of 204 under the unconstrained scenario [as shown in Table 3.6]. If the constrained scenario reflects the airlines' response to increased delays by increasing seating densities and load factors, then the average seats per departure would be higher than under the unconstrained conditions.

All this casts doubt about the validity of the forecast numbers and requires correction, and a clarification of the assumptions used about the relation between flight operations and passenger traffic forecasts.

Response: The commenter does not provide any specific comment or question, but rather summarizes the results of the forecast and flight schedule development analyses, documented in Appendix B of the Draft EIR, as noted by the commenter.

The commenter also discusses the assumptions documented in Section 4.4.4 of Appendix B.1 related to the assumed ratio of commercial passenger operations to total operations, assumed average load factors, and assumed average number of seats per departure. Contrary to the commenter's suggestion, there were no mathematical errors in the calculations of the number of Million Annual Passengers (MAP) reported in Table 4-1 in Section 4.5 of Appendix B.1. The commenter attempts to recalculate the MAP number for 2045 documented in Table 4-1 using the assumptions listed in Section 4.4.4 of Appendix B.1, by multiplying the estimated total number of operations (853,000) by the ratio of commercial passenger operations to total operations (90%), multiplied by the assumed average load factor ratio (90%), and multiplied by the assumed average number of seats per departure (190). As noted by the commenter, these calculations

result in approximately 131 MAP (as rounded), as opposed to 127.9 MAP documented in the Table 4-1 in Section 4.5 of Appendix B.1.

However, the methodology used by the commenter simply, and inappropriately, assumes that the calculations of MAP from 2018 through 2045 are linear and that each ratio (listed above) remains constant year after year. That is not the case. The forecasts of annual operations and passengers assumed variations year after year, to reflect the incremental changes in assumed load factors and average numbers of seats per departure. These assumptions were clearly documented in Section 4.4.3 of Appendix B.1 which states: "The process of adjusting fleets and flight schedules is expected to be gradual over time." Similarly, Section 4.4.4 of Appendix B.1 states: "It was also assumed that commercial passenger airlines would allow load factors to increase up to approximately 90 percent, while continuing to operate a predominantly narrowbody fleet at LAX (as documented in Table 3-6 by the LAX average number of seats per departure representative of ADG III aircraft)."

Detailed data and calculations supporting the data documented in Table 4-1 in Section 4.5 of Appendix B.1 are provided below. As shown, the calculations of operations and MAP were derived assuming incremental increases in the average numbers of seats per commercial passenger aircraft and average load factors. As shown, and as documented in Section 4.4.4 of Appendix B.1, the ratio of commercial passenger operations to total annual operations was assumed to remain constant at 90 percent.

Fiscal Year	Total Numbers of Annual Operations	Numbers of Commercial Passenger Operations	Ratio of Commercial Passenger Operations to Total Annual Operations	Numbers of Annual Seats	Average Numbers of Seats per Commercial Passenger Aircraft	Million Annual Passengers (MAP)	Average Load Factors
2018	715,000	643,500	90%	102,094,000	159	86.1	84%
2019	722,000	649,800	90%	104,567,000	161	88.3	84%
2020	729,000	656,100	90%	107,025,000	163	90.6	85%
2021	736,000	662,400	90%	109,221,000	165	92.9	85%
2022	744,000	669,600	90%	111,465,000	166	95.3	85%
2023	752,000	676,800	90%	113,759,000	168	97.7	86%
2024	760,000	684,000	90%	116,148,000	170	100.3	86%
2025	769,000	692,100	90%	118,611,000	171	102.9	87%
2026	778,000	700,200	90%	121,151,000	173	105.5	87%
2027	789,000	710,100	90%	123,956,000	175	108.1	87%
2028	800,000	720,000	90%	126,767,000	176	110.8	87%
2029	809,000	724,000	90%	129,710,000	179	113.4	87%
2030	813,000	731,700	90%	131,384,300	180	115.6	88%
2031	817,000	735,300	90%	132,508,700	180	116.6	88%
2032	821,000	738,900	90%	133,637,700	181	117.6	88%
2033	824,500	742,050	90%	134,689,800	182	118.5	88%
2034	828,000	745,200	90%	135,745,900	182	119.5	88%

Fiscal Year	Total Numbers of Annual Operations	Numbers of Commercial Passenger Operations	Ratio of Commercial Passenger Operations to Total Annual Operations	Numbers of Annual Seats	Average Numbers of Seats per Commercial Passenger Aircraft	Million Annual Passengers (MAP)	Average Load Factors
2035	831,000	747,900	90%	136,723,900	183	120.3	88%
2036	834,000	750,600	90%	137,705,000	183	121.2	88%
2037	837,000	753,300	90%	138,690,000	184	122.0	88%
2038	840,000	756,000	90%	139,678,900	185	122.9	88%
2039	842,500	758,250	90%	140,587,000	185	123.7	88%
2040	845,000	760,500	90%	141,498,900	186	124.5	88%
2041	847,500	762,750	90%	142,413,000	187	125.3	88%
2042	849,500	764,550	90%	143,246,000	187	126.1	88%
2043	851,500	766,350	90%	144,082,000	188	126.8	88%
2044	852,500	767,250	90%	144,750,000	189	127.4	88%
2045	853,000	767,700	90%	145,334,000	189	127.9	88%

For narrative purposes in Section 4.4.4 of Appendix B.1, the assumed load factor in 2045 was correctly rounded up from the computed 88 percent to "approximately 90 percent." Similarly, the assumed average number of seats per commercial passenger aircraft was rounded up from 189 to "approximately 190 seats per aircraft." Therefore, based on the computed data presented on the last row of the table above for 2045, the MAP number documented in Table 4-1 in Section 4.5 of Appendix B.1 are valid and can be verified using the commenter's methodology as follows:

- Commenter's calculation: 853,000x0.9x0.9x190 = approximately 131.3 MAP
- Draft EIR calculation based on computed data: 853,000x0.9x0.88x189 = approximately 127.7 MAP (the difference between 127.7 and 127.9 is due to rounding in assumed ratios and calculations)

The commenter also discusses and compares the average number of seats per departure assumed under the unconstrained and constrained forecast results. However, the commenter cited the results documented in Table 3-6 in Section 3.2.3 of Appendix B.1 incorrectly. The average number of seats per departure in 2045 reported in Table 3-6 was 202 seats, not 204 seats as cited by the commenter.

The commenter suggests, with no supporting evidence, that the average number of seats per departure under the constrained demand scenario should have been higher than the number of seats per departure assumed under the unconstrained forecast if airlines rely on "increasing seating densities and load factors" to respond to increase delays. This is inaccurate. With a similar load factor of approximately 90 percent, accommodating fewer passengers under the constrained demand scenario requires fewer seats and, therefore, a lower average number of seats per departure (at approximately 190 seats); compared to 202 seats under the unconstrained forecast. These average numbers of seats per departure remain representative of narrowbody

aircraft fleets, consistent with a key assumption documented throughout Section 4 of Appendix B.1. These assumptions are also consistent with operating conditions at LAX in the 2018 baseline flight schedule, in which 77 percent of scheduled passenger airlines operations were operated using Airplane Design Group (ADG) III aircraft (i.e., narrowbody aircraft with single aisles), as documented in Section 1.3 of Appendix B.2 (Operational Analyses Report) of the Draft EIR.

Section 4.4.4 of Appendix B.1 clearly states that under the constrained demand scenario, "[i]t was also assumed that commercial passenger airlines would allow load factors to increase up to approximately 90 percent, while continuing to operate a predominantly narrowbody fleet at LAX". This is important because it discusses how the forecasts relied upon a combination of higher load factors and increased seating capacity (which is acknowledged by the commenter, as cited above). Under the constrained demand scenario, assumed higher load factors provided enough seats to accommodate the projected passenger demand, without requiring further increasing the size of the aircraft (i.e., with greater seating capacity). That is why the constrained demand scenario resulted in an average number of seats per departures of 190 seats. Conversely, the unconstrained forecast results assumed marginally greater seating capacities in combination with high load factors to accommodate the projected passenger demand. That is why the unconstrained forecast resulted in an average number of seats per departures of 202 seats. Both forecast scenarios provided enough seats to accommodate the projected passenger demand, and therefore enough aircraft operations.

Therefore, contrary to the commenter's claim, none of the commenter's statements discussed above demonstrate any flaws, omissions, or errors with the forecast results documented in Appendix B of the Draft EIR. No further clarification is warranted in the EIR document.

ATMP-AL010-204

Comment: However, the major flaw in the DEIR is that it assumes implicitly that the evolution of delays is unaffected by the proposed improvements. It assumes that average annual delay will reach 15 minutes in 2031 regardless of the improvements in the project. As shown in the operations analysis discussed in the following paragraphs, the proposed improvements are estimated to result in a reduction in average delay [See Appendix B.2 Exhibit 3-2], which means the ability of the airport to handle additional traffic before the onset of the 15-minute average and the start of the constrained growth. This means more traffic with the improvements than without, whether in 2028, 2035 or 2045.

Therefore, the DEIR fails to assess the effect of the improvements on traffic growth and on the resulting environmental impact of this growth. The analysis in the forecasting section of the DEIR should be performed with and without the ATMP in order to correctly assess the impact of the improvements on traffic growth.

Response: The commenter's assertion, that the Draft EIR implicitly assumed that the evolution of delays is unaffected by the proposed improvements, is incorrect. The Draft EIR clearly

analyzed and documented the difference in annualized average all-weather delay results between the proposed Project and the No Project scenarios in 2028, as discussed in Section 3.6 of Appendix B.2 of the Draft EIR, as follows: "These differences in operational conditions resulting from the With Project improvements translate into reductions in annualized average delay in FY 2028 as shown on Exhibit 3-2." Therefore, contrary to the commenter's statement, there is no flaw in the Draft EIR. The remainder of Section 3.6 of Appendix B.2 of the Draft EIR further documents the rationale behind the difference in annualized average delays.

The first paragraph of the comment also serves as an introduction to the remainder of the comment letter by Professor Kanafani. Please see Responses to Comments ATMP-AL010-205 through -207 for responses to the "operations analysis" provided by the commenter, which include discussions regarding how the incremental benefit of east flow operating configurations provided by the proposed Project improvements does not change the results of the forecasts of aircraft operations and passengers.

ATMP-AL010-205

Comment: Operational and Capacity Issues

The DEIR adopts the industry standard approach of defining capacity in terms of delay. Capacity is assumed to be reached when a particular level of "tolerable delay" is reached. In the DEIR the annualized average delay of 15 minutes per operation is adopted as the standard, although for determining the long-term constrained forecast traffic 18 minutes was assumed to be reached in 2045. The industry standard simulation model, SIMMOD, is used to calculate delay given a set of assumptions about the operational characteristics (runway operations, fleet mixes, gate assignments, weather conditions, etc.).

The improvements in this project include the improvement of exit taxiways on runway 6L/24R with the reconfiguration of 2 existing exit taxiways and the addition of 2 new high-speed exit taxiways and the improvements of taxiways D and C.[1] These improvements, by streamlining the exit process in both directions on runway 6L/24R will reduce runway occupancy time and increase the throughput, or capacity of the runway.

As shown in Appendix B.2 of the DEIR, this SIMMOD simulation was run for the years 2018 and 2028, but not beyond. It was used to estimate the annualized annual average delay per operation with and without the improvements. The results show a reduction of annualized total average delays of 0.5 minutes per operation in 2018 and 1.3 minutes per operation in 2028. [see Tables 3-2 and 3-3 and Exhibit 3-2].

Thus, the analysis clearly demonstrates that by reducing delays the capacity of the airfield, which is the limiting capacity of the airport, is increased by the proposed improvements. As mentioned earlier, this increase in capacity has not been taken into account in the estimation of impacts of the improvements on traffic growth and on the development of the constrained traffic forecast.

[1] The improvement of taxiway C is not identified explicitly as an input into the simulation modeling, and may have been included under "…and other taxiway and taxi-lane improvements". This needs to be clarified. It should be noted that the DEIR incorrectly labels the proposed extension of Taxiway C as a "Terminal Area Element" rather than an "Airfield Element." [See DEIR at p. 2-28] LAWA previously proposed the Taxiway C extension in 2013 associated with improvements to the Runway 7L/25R Runway Safety Area (RSA), but ultimately did not approve the taxiway extension.

Response: As the commenter acknowledges, the Draft EIR analyses were prepared using industry standard approaches and methods in defining practical capacity (i.e., the annualized number of aircraft operations that can be accommodated by the airfield resulting in 15 minutes of annualized average all weather) and using the airfield simulation model SIMMOD. These facts are documented in Sections 4.2.1 and 4.2.2 in Appendix B.1 of the Draft EIR, respectively. The commenter also acknowledges the use of the 18 minutes of annualized average all-weather delay to estimate the 853,000 annual operations in 2045 (as documented in Section 4.4.3 in Appendix B.1). No comments or questions were raised by the commenter about this methodology and approach.

The commenter also discusses the taxiway improvements assumed in the proposed Project and questions, in Footnote 1, if the extension of Taxiway C was an input into the airfield simulations. Taxiway C was assumed in the Draft EIR airfield simulations. Please see Response to Comment ATMP-AL010-56 for confirmation of that fact and additional information.

The commenter further discusses the reconfiguration of the Runway 6L-24R exit taxiways and runway occupancy times (ROTs). ROTs and in-trail separation input information was accounted for in the airfield simulation model. In-trail separation refers to the longitudinal (nose to tail) distance between two aircraft maintained by pilots based on guidance provided by the FAA's Air Traffic Control (ATC) personnel. Specifically, in-trail separation input into the airfield simulation model made spacing to Runway 6L consistent with that typically applied by the FAA's Air Traffic Control (ATC) personnel for the other arrival runways and is the primary cause of reduced delay in the East MVFR model results. The Runway 24R exit taxiway improvements would not significantly impact ROTs under west flow operating configurations. The FAA ATC personnel already applies minimum in-trail separations for arrivals to Runway 24R. No changes to in-trail separations were assumed to Runway 24R and, therefore, there would be no impact on runway throughput associated with the Runway 6L-24R exit taxiway reconfiguration under west flow operating configurations.

The commenter correctly cites the results of the SIMMOD simulations presented in Tables 3-2 and 3-3 in Appendix B.2 of the Draft EIR. As depicted on Exhibit 3-2 in Appendix B.2 of the Draft EIR, the differences in annualized average delays between the proposed Project and No Project scenarios are 0.5 minute in 2018 and 1.3 minutes in 2028, respectively. No comments or questions were raised by the commenter about these results. The commenter further asserts that "by reducing delays, the capacity of the airfield, which is the limiting capacity of the airport, is increased by the proposed improvements." The commenter is correct that LAX's airfield system component would

be the first of the three airport system components (in addition to the terminal and landside components) to constrain the ability of LAX to accommodate the forecasted unconstrained demand, as documented in Section 4.3 of Appendix B.1 of the Draft EIR. Additionally, as documented in Section 3.6 of Appendix B.2, differences in operational conditions resulting from the proposed Project improvements translate into reductions in annualized average delay in 2028. However, it is not accurate that the proposed Project would reduce delays in a manner that would increase the capacity of the airfield. This is due to the following facts, which are also documented in the Draft EIR:

- Estimated reductions in delays are driven by east flow operating conditions. As documented in Section 3.6 of Appendix B.2, the simulated reductions in delay were primarily driven by operational improvements during east flow operating conditions (dictated by changes in wind conditions). East flow operating conditions occur less than two percent of the time at LAX. The remaining 98 percent of the time, LAX operates in west flow. Under west flow operating conditions, the proposed Project taxiway improvements would not provide arrival operational benefits as substantial as those measured in east flow.
- Operating LAX under east flow operating conditions is the sole decision of the FAA based on weather conditions. Neither the airlines nor LAWA control the operating configurations of the airfield at LAX. As documented in Section 3.2 of Appendix B.2, wind speed and wind direction dictate the direction in which the runways are utilized for arrivals and departures (e.g., east flow or west flow). As further documented in Section 3.6 of Appendix B.2, only FAA's ATC personnel manages the flow of aircraft and decides when wind conditions require changes in operating configurations such as east flow.
- Airlines would not schedule additional flights based on LAX operating under east flow conditions. That is because these conditions occur only two percent of the time. As stated by LAWA's aviation experts in Section 3.6 of Appendix B.2, airlines schedule flights based on the typical operating conditions at the airport. Flight scheduling could not possibly be done based on the possibility that the FAA ATC personnel will operate LAX under east flow conditions, which only occurs approximately two percent of the time. That is particularly true where, as here, these relatively infrequent conditions are inherently unpredictable and depend upon weather conditions at LAX. Section 4.4.2 of Appendix B.1 further discusses how airlines prepare and adjust flight schedules between a few months and more than a year prior to flight. In addition, as documented in Section 4.4.1 of Appendix B.1, any changes implemented by the airlines must be in the context of the airlines' overall networks, not just based on LAX operations. Adjusting flight schedules is a complex task which involves considering various factors to optimize flight schedules, considering revenues (including decisions on times, frequencies, competition), constraints (aircraft size, maintenance, flight crews), reliability (flexibility, spare aircraft, reserve crews), and efficiency (aircraft size, gate utilization, flight crews, and maintenance). Please see Topical Response TR-ATMP-G-1 for additional information regarding the factors influencing airline schedules and passenger demand.

Therefore, as discussed in Section 3.6 of Appendix B.2, even though the proposed Project improvements provide an incremental benefit in east flow (in the form of reduced airfield delays), the forecasted aircraft operations and passenger demand (and airline

scheduling practices to meet such demand) in 2028 would not change as a result of the proposed Project improvements. As a result, the assumptions and results of the constrained demand scenario documented in the Draft EIR remain valid and provide substantial evidence in the record that proposed Project improvements would not directly or indirectly induce growth at LAX.

ATMP-AL010-206

Comment: The analysis shown in the DEIR and reported in Exhibit 3-2 fails to adequately assess the impact of the improvements on airport capacity and on traffic growth for two reasons.

First, given the exponential nature of delay growth with increasing traffic as acknowledged earlier in the DEIR, the 1.3 minutes savings per operation in 2028, which may seem to be too small to have an impact on traffic growth, would increase rapidly past 2028 resulting in a significant impact from the improvements. By limiting the analysis to 2028, the DEIR fails to assess these savings due to the project and their impact on traffic growth.

Response: Contrary to the commenter's assertion, the Draft EIR adequately assessed the impacts of the proposed improvements on airport capacity and passenger growth. See Response to Comment ATMP-AL010-205 for a discussion of the airfield simulation results and associated reductions in delays documented in Appendix B.2 of the Draft EIR.

The commenter discusses the exponential nature of aircraft delays. As documented in Section 4.2.2 of Appendix B.1, the Draft EIR technical analyses relied upon an exponential curve to analyze the relationship between the number of aircraft operations and the resulting annualized average delay numbers. Exhibit 4-1 in Appendix B.1 depicts the estimated airfield delay curve used to estimate the number of aircraft operations (i.e., 833,000 annual aircraft operations) associated with 15-minute of annualize average all-weather delay. It must be noted that this delay curve was developed based on three levels of activity (i.e., number of aircraft operations) commensurate with the results of the unconstrained forecasts. Because unconstrained growth at LAX cannot be reasonably expected, LAWA's aviation experts further analyzed and developed a constrained demand scenario (documented in Section 4.4 of the Appendix B.1) to estimate anticipated growth beyond the 15-minute of annualize average all-weather delay indicator. Accordingly, the estimated growth rate in aircraft operations under the constrained demand scenario was determined to be 0.7 percent compounded annual growth rate (CAGR), as documented in Table 4-1 in Appendix B.1, compared to 1.1 percent CAGR under the unconstrained forecast documented in Table 3-8 in Appendix B.1. Therefore, the difference in annualized average delay results between the proposed Project scenario and the No Project scenario will be limited by the slowing down of growth in aircraft operations.

As documented in Chapter 1-5 of the Draft EIR, and throughout Appendix B.2, the airfield simulations analyzed activity levels in 2018 and 2028, consistent with the buildout horizon year of the proposed Project. Analyzing activity levels post-2028 is beyond the scope of the Draft EIR analyses. See also Topical Response TR-ATMP-G-3 for additional

discussion regarding the appropriateness of focusing the analysis of impacts on Project buildout in 2028.

ATMP-AL010-207

Comment: Second, the detailed results of the simulation [Tables 3-2 and 3-3] show wide variations in delay around the annualized total average delay for the various operational conditions and around the average savings from the project. Thus, while the savings in the overall average delay are 1.3 minutes per operations, savings for some of the operating configurations are far more significant. For example, under West IFR operations the average delay drops due to the improvements from 42.9 to 35.2 or 7.7 minutes per operation. For East MVFR conditions the delay drops due to the improvements from 64.2 to 19.5 or 44.7 minutes per operation. Such gains are significant and are masked when using only the annualized total average. This is especially serious since as the DEIR correctly recognizes, airlines adjust their schedules to adapt to large increases in delay. These large variations in delay savings due to the project will be even more significant when the analysis is carried beyond 2028.

Response: The commenter discusses airfield simulation results presented in Tables 3-2 and 3-3 of Appendix B.2 of the Draft EIR. These tables present the simulation results for the No Project scenario (Table 3-2) and the proposed Project scenario (Table 3-3), in 2018 and 2028, for the various operating configurations at LAX. These operating configurations are described in Table 3-1 of Appendix B.2 and summarized as follows:

Operating Configuration	Approach Type	Normalized Occurrence
West Visual Flight Rules (VFR)	Visual Approaches	68.4%
West Marginal Visual Flight Rules (MVFR)	Instrument Landing System (ILS) Approaches	25.7%
	West VFR and West MVFR Subtotal:	*94.1%*
West Instrument Flight Rules (IFR)	Instrument Landing System (ILS) Approaches	4.0%
East Marginal Visual Flight Rules (MVFR)	Instrument Landing System (ILS) Approaches	1.9%
	Total:	**100.0%**

Accordingly, LAX typically operates most of the time (94.1 percent) under West VFR and West MVFR operating conditions.

The commenter asserts that wide variations in delay results are shown when comparing Tables 3-2 and 3-3 of Appendix B.2 under certain operating configurations.

The first comparison that the commenter discussed correctly relates to annualized average all-weather delay results used on the Draft EIR technical analyses. The total annualized averaged delay result under West Instrument Flight Rules (IFR) is 42.9 minutes under the No Project scenario, compared to 35.2 minutes of total annualized

averaged delay under the proposed Project scenario in 2028. It is important to note that LAX typically operates under West IFR conditions only 4 percent of the time, as shown in the table above.

The second comparison that the commenter provides does not relate to total annualized averaged delay results, but rather to air delay results presented in the columns labelled "Air" in Tables 3-2 and 3-3 of Appendix B.2, which are only a subset of the overall average delay calculations. It is critical to also include aircraft delays associated with aircraft ground movements to consider all components of the airspace and airfield being analyzed. Accordingly, the appropriate comparison should be between total annualized average delays for East MVFR should be referenced, which are 37.6 minutes under the No Project scenario and 15.9 minutes under the proposed Project scenario in 2028, resulting in a difference of 21.7 minutes, not the 44.7 minutes for just air delay that commenter references.

As documented in Section 3.6 of Appendix B.2, the primary operational benefit of the proposed Project airfield components is reduced delay during East MVFR conditions but these conditions occur very infrequently (less than 2 percent of the time, as shown in the table above) and do not affect forecast growth assumptions, as further discussed in Response to Comment ATMP-AL010-205.

Further, West IFR and East MVFR never occur for all 24 hours in a given day. Nevertheless, the Draft EIR's operational analyses simulated these conditions for planning purposes and to provide a conservative assessment of the impacts of various operating configurations on the delay results documented in Appendix B.2. Accordingly, the airfield simulation model measured the delay as if West IFR and East MVFR conditions were to occur for an entire day. Thus, the results presented in Tables 3-1 and 3-2 of Appendix B.2 are weighted into annualized average delay values to account, and the weighting of results during the annualization process accounts for how infrequently these conditions occur relative to other operating configurations. Therefore, reporting annualized average all-weather delay results appropriately reflect the anticipated operating configurations based on LAX's typical operating conditions.

As documented in Section 4 of Appendix B.1, LAWA's aviation experts developed a constrained demand scenario based on annualized average all-weather delays and associated definition of LAX's practical capacity, following industry standard methodology and approaches. Contrary to the commenter's claim, using annualized average all-weather delays was not done to "mask" differences in delays between the two project scenarios. Tables 3-2 and 3-3 of Appendix B.2 adequately disclosed all elements encompassed by the calculations of annualized average all-weather delays.

Considering every type of delay documented in Tables 3-2 and 3-3 (e.g., air, runway crossing, taxi in, taxi out, etc.) under each operating configuration would be unreasonable and unwarranted. Please see Response to Comment ATMP-AL010-205 which discusses how airlines prepare flight schedules based on typical operating conditions at the airport, as opposed to the possibility that LAX will operate under West IFR or East MVFR in the future, which neither LAWA nor the airlines have any control over. Accordingly, the airlines would not consider variations in air delay under East MVFR

operating conditions (which occur less than 2 percent of time) to adjust their schedules to react to increased airfield congestion and delays. As discussed in Section 4.4 of Appendix B.1, it is reasonable to assume that airlines would react and start making adjustments to their flight schedules based on overall delays at LAX (as opposed to subsets of delays or specific airfield operating configurations). The Draft EIR appropriately defines and documents overall delay levels throughout Section 4 of Appendix B.1, starting with the definition of LAX's practical capacity.

The commenter concludes by suggesting that variations in delay would be even more significant beyond 2028. As documented in Chapters 1-5 of the Draft EIR, and throughout Appendix B.2, the airfield simulations analyzed activity levels in 2018 and 2028, consistent with the buildout horizon year of the proposed Project. Analyzing activity levels post-2028 is beyond the scope of the Draft EIR analyses.

ATMP-AL010-208

Comment: Summary and Recommendation

The DEIR for the LAX ATMP project incorrectly ignores the traffic growth effects of the project. It incorrectly ignores the fact that capacity improvements, as reflected by reduced delays with the project, will result in faster traffic growth than without it. Since, as the DEIR indicated, the capacity of the runway system is the limiting capacity of the airport, the increase in the number of gates with this Project to 177 and the resulting expansion of the terminal system capacity makes little business sense, were it not for the runway capacity increases expected from this Project.

Response: This comment is part of the commenter's summary and recommendations section of the comment letter. Please see detailed responses to the commenter's statements that support their summary section in Responses to Comments ATMP-AL010-205 through ATMP-AL010-207.

Contrary to the commenter's assertion, the Draft EIR did not ignore the potential growth effects associated with the proposed Project improvements. Appendix B of the Draft EIR clearly documents the analyses conducted by LAWA's aviation experts. The Draft EIR clearly disclosed the difference in annualized average all-weather delay results between the proposed Project scenario and the no project scenario. It also clearly documented how these differences in average delay results would not result in increased activity levels at LAX, as further documented in Responses to Comments ATMP-AL010-205 through -207.

The commenter also provides an unsupported opinion that the proposed Project improvements make "little business sense." The Draft EIR is not required to document the business rationale or purpose of a proposed project. (See Pub. Resources Code, Section 21002.1(a); State CEQA Guidelines, Section 15131.) However, please see Chapter 2 of the Draft EIR for a discussion of the project objectives established for the LAX Airfield and Terminal Modernization Project and how the proposed Project improvements were identified to meet these objectives. As explained therein, the LAX Airfield and Terminal

Modernization Project would support the ongoing modernization of LAX, to provide enhanced passenger service and experience (supported by, among other improvements, reducing the inconvenience and inefficiency associated with busing passengers to and from the West Remote Gates), to support the economic growth and prosperity of the Los Angeles region, and to work closely with neighboring communities to reduce airport-related impacts. These improvements would help LAX to prepare early for the continued aviation growth that is projected by LAWA, SCAG, and the FAA to occur at LAX over the next several decades. Additionally, the nature and timing of improvements included in the proposed Project are integral to Los Angeles' plans to host the 2028 Olympic and Paralympic Games, with LAX serving as the main portal for athletes, dignitaries, and visitors from around the world.

ATMP-AL010-209

Comment: The DEIR should clarify the forecast assumptions used in projecting flight operations and passenger traffic under the constrained and unconstrained scenarios and correct any calculation errors in these forecasts.

Response: This comment is part of the commenter's summary and recommendations section of the comment letter. Please see detailed responses to the commenter's statements in Responses to Comments ATMP-AL010-205 through ATMP-AL010-207.

Appendix B of the Draft EIR clearly and adequately documented all assumptions used in projecting aircraft operations and passenger activity levels at LAX. Therefore, contrary to the commenter's assertion, no additional information is required.

Please see Response to Comment ATMP-AL010-203 for responses to the commenter's assertion that calculation errors were made in Appendix B.1 of the Draft EIR. No known calculation errors were made in Appendix B of the Draft EIR.

ATMP-AL010-210

Comment: The DEIR should extend the traffic modeling analysis to quantify the effect of the project improvements on airport delays and consequently on traffic growth. The SIMMOD model simulations should be conducted with and without the project, and extended beyond 2028. The results of the model should be carefully analyzed to take into consideration potential large delay savings during specific operational conditions and their potential impact on traffic growth.

Response: This comment is part of the commenter's summary and recommendations section of the comment letter. Please see detailed responses to the commenter's statements that support their summary section in Responses to Comments ATMP-AL010-205 through -207.

As discussed in Response to Comment ATMP-AL010-208, the Draft EIR clearly documented and disclosed the difference in annualized average all-weather delay

results between the proposed Project scenario and the No Project scenario. It also clearly documented how these differences in average delay results would not result in increased activity levels at LAX. Therefore, no additional modeling is required.

As documented in Section 3 of Appendix B.2 of the Draft EIR, airfield SIMMOD simulations were conducted for both scenarios (proposed Project and No Project). As documented in Chapters 1-5 of the Draft EIR, and throughout Appendix B.2, the airfield simulations analyzed activity levels in 2018 and 2028, consistent with the buildout horizon year of the proposed Project. Analyzing activity levels post-2028 is beyond the scope of the Draft EIR analyses. See also Topical Response TR-ATMP-G-3 regarding the uncertain and speculative nature of attempting to evaluate activities and impacts beyond the Project's buildout horizon year of 2028. Please see Response to Comment ATMP-AL010-207 for responses to the commenter's assertion that large variations in delay savings should be further analyzed.

ATMP-AL010-211

Comment: Following is Illingworth & Rodkin, Inc's (I&R) review of the Noise Sections and the Appendix F Noise Report contained in the LAX Airfield and Terminal Modernization Project Draft Environmental Impact Report (DEIR) with respect to environmental noise issues.

Section 4.7.1 (Aircraft Noise)

Typical Ambient noise levels
The Community Noise Equivalent Level (CNEL) discussion in section 4.7.1.1.2 reports the typical outdoor noise levels for developments adjacent to major freeways at 85 dBA CNEL, a level which I&R considers quite high. In discussions of typical environmental noise levels, I&R and others commonly considers noise levels of 75-80 dBA to be normal at the first row of developments outside a freeway right-of-way[1,2]. Overstating typical levels may result in the high noise project operational noise levels being interpreted as being a normal condition and thus understate the relative impact of project generated noise on surrounding uses.

[1] Corbisier, Chris, "Living with Noise", Federal Highway Administration Research and Technology, https://www.fhwa.dot.gov/publications/publicroads/03jul/06.cfm
[2] Noise Elements of Alameda County (Eden Area), Marin County, City of San Jose, and the City of Berkeley.

Response: Section 4.7.1.1.2 defines noise descriptors for the purpose of establishing a common understanding of technical noise terminology. To provide context to the definition of CNEL, the text identifies examples of typical outdoor noise levels, including the statement that "typical outdoor noise levels measured in terms of CNEL decibel levels include...development adjacent to a major freeway at approximately 85 CNEL." (See Draft EIR page 4.7.1-5.) However, these examples are for informational purposes only and were not used to validate or calibrate aircraft noise modeling nor in any regulatory

analysis for determining impact. Rather, as described in Section 4.7.1.2.1 of the Draft EIR, aircraft noise for existing baseline conditions (calendar year 2018) was modeled using AEDT and served as the basis of comparison to modeled results for future years in determining Project impacts. Moreover, the relative impact of Project-generated noise was determined using thresholds of significance based on the L.A. CEQA Thresholds Guide and Appendix G of the State CEQA Guidelines, not on the noise levels described in Section 4.7.1.1.2. (See Section 4.7.1.4 of the Draft EIR.) Therefore, the typical levels described in Section 4.7.1.1.2 do not have an effect on the interpretation of project operational noise levels nor any statements regarding their relative impact on surrounding land uses.

In addition, the source cited in the comment states that "[sound] levels of highway traffic noise typically range from 70 to 80 dB(A) at a distance of 15 meters (50 feet) from the highway."[1] Because CNEL is a cumulative metric that includes weighting for evening and nighttime events, sound levels between 70 and 80 dB(A) could yield a value of 85 CNEL depending on the time of day and frequency of events.

[1] Corbisier, Chris, "Living with Noise", Federal Highway Administration Research and Technology, 2003. Available: https://www.fhwa.dot.gov/publications/publicroads/03jul/06.cfm.

ATMP-AL010-212

Comment: Sleep Disturbance, Physiological Response and Annoyance Discussions
Section 4.7.1.1.3 of the DEIR includes a fairly extensive discussion of the effects of noise on sleep disturbance, physiological response and annoyance with the effect of maximum noise and single event levels on these subjects presented in each case. However, following these discussions, the DEIR concludes that, since there is a debate in the scientific community and/or definitive correlations to how these effects are related to environmental noise, and that there is no established regulatory criteria specific to these noise effects, the evaluation of noise impacts in terms of appropriate event based noise metrics (Lmax, SEL, or TA noise metrics) can be ignored.

Response: Please see Topical Response TR-ATMP-N-1 regarding health effects of noise and Topical Response TR-ATMP-N-2 regarding adequacy of the aircraft noise analysis and use of alternative metrics. The Draft EIR does not state that the potential for such effects can be ignored. Instead, the Draft EIR provides an extensive discussion of available literature addressing this issue.

ATMP-AL010-213

Comment: The text further posits that the nighttime and evening noise penalties in the time averaged CNEL noise metric, which accounts for the increased sensitivity to noise events happening during hours when most sleep occurs, make the use of this metric acceptable for use in evaluating sleep disturbance and residential awakenings. While average

day/night noise metrics such as the CNEL are useful in evaluating noise and land use compatibility on a programmatic basis, in I&R's experience the actual (project level) impacts of loud events, which is the dominant noise produced by aircraft operations, are generally experienced by community members on an event and not on an average basis (e. g. individuals typically experience loud distinct events on a per event basis not as an overall average level over time).

Whereas it is true that there are no established noise regulatory criteria specific to sleep disturbance, annoyance, and other physiological responses and that there is debate in regarding the relationship between aircraft noise and these subjects, as noted on pages 4.7.1-12 to 4.7.1-13, there are documented correlations between aircraft event noise and significant sleep disturbance, physiological response and annoyance. Therefore, it would follow that the fully evaluate the effect of aircraft noise due the project, the DEIR should present and discuss aircraft event based noise data such as the Lmax, SEL, and TA noise metrics.

Intermittent and impulsive noises, such as aircraft overflights, have been found to be more disturbing to sleep than continuous noise sources. Additionally, aircraft noise is more annoying when it occurs at times when people expect to rest or sleep and can produce short-term adverse effects, such as mood changes and poor performance at work the next day. The possibility also exists for more serious effects on health and well-being when sleep interference continues over long periods of time.

Though studies of aircraft noise-induced sleep disturbance have noted that while the use absolute event-based sound levels such as SELs are less likely to accurately predict awakenings than other noise effects from airport to airport, it has been established that the consideration of habituation and the noise environment of the existing properties neighboring an airport in conjunction with event-based noise levels such that the relative change in single event noise levels is a strong predictor of sleep disturbance[3]. This would indicate that the analysis of existing and project generated single event levels is specially needed to fully evaluate noise impacts in areas which will be newly exposed to aircraft noise due to future project aircraft operations or temporary construction related aircraft noise increases.

[3] Fidell S., Tabachnick B., Mestre V., and Fidell L. "Aircraft noise-induced awakenings are more reasonably predicted from relative than from absolute sound exposure levels," The Journal of the Acoustical Society of America 134, 3645 (2013)

Response: Please see Topical Response TR-ATMP-N-1 regarding health effects of noise and Topical Response TR-ATMP-N-2 regarding adequacy of the aircraft noise analysis and use of alternative metrics, such as single event metrics.

ATMP-AL010-214

Comment: In terms of precedent for this approach, it should be noted that recent the noise analyses of the Bob Hope (Burbank) Airport and the San Jose International Airport (SJC) present and discuss event-based aircraft noise data.

• The Noise Analysis of the Burbank Airport - Replacement Terminal EIR[4] contains SEL contours and SEL data tables to compare the SEL values for the noisiest passenger aircraft at the Airport at selected noise-sensitive receptors. Though the discussion of this analysis notes that this provided for informational purposes only disclosing this information, it is noted in this document that aircraft SEL data is valuable in demonstrating the spatial extent of noise events resulting from aircraft operations for various project alternatives.
• The Noise Assessment for the SJC Master Plan EIR[5] also presents Time Above (TA) vales for aircraft noise levels are greater than 75 dB and 85 dB at various receiver points, along with the overall land area exposed the SEL values for the departure and arrival of various aircraft types. It is also noted in SJC EIR that an earlier (2003) EIR contained a similar analysis comparing existing and future SEL conditions and identified increases in SEL values in the airport vicinity.

Considering this, I&R believes that the aircraft noise analysis should at least provide event-based noise data such as maximum noise levels, single event levels, and/or time above information for existing and future aircraft operations at residential and other noise sensitive uses in the airport vicinity. Additionally, we would note that the modeling software used in the noise analysis (FAA AEDT), has the ability to create a grid analysis graphic of changes in event based (Lmax) aircraft noise levels at residential and other noise sensitive uses in the airport vicinity. The inclusion of such a graphic and event-based noise data in combination with information provided on awakenings, sleep disturbance, and physiological effect of aircraft noise would allow the surrounding communities to be more fully informed as to the potential effects and impacts of aircraft noise.

[4] RS&H, Inc for the Burbank-Glendale-Pasadena Airport Authority, Appendix K Noise Analysis, Environmental Impact Report for a Replacement Airline Passenger Terminal at Burbank Bob Hope Airport, June 2016
[5] BridgeNet International for David J. Powers and Associates, Norman Y. Mineta San Jose International Airport Noise Assessment for the Master Plan Environmental Impact Report, October 2019

Response: Please see Topical Response TR-ATMP-N-2 regarding adequacy of the aircraft noise analysis and use of alternative metrics, including a review of CEQA airport documents published over the last 10 years.

ATMP-AL010-215

Comment: Aircraft Noise Modeling
I&R concurs that the use of the FAA AEDT computer model as discussed in section 4.7.1.2.1 is appropriate for analyzing aircraft noise in the surrounding communities. However, we are surprised that the future analysis study year is only 10 years from the baseline year (2028), whereas many large projects include study years which are 20 years in the future so as to avoid a future year too close to the current year once the project is implemented.

The SJC EIR, referenced above, used 20 years as its future analysis point future by analyzing the future noise environment due to aircraft operational levels from the approved aviation forecast in its 2017 Master Plan study to the year 2037. Many other masterplan studies and major infrastructure projects I&R has been involved with have analyzed future transportation noise impacts 20 or more years in the future. Large infrastructure projects in the local area where future noise projections of 20 or more years in the future have been analyzed include EIRs for the Port of Los Angeles Everport (Berths 226 to 236) and TraPac (Berths 136-147) Container Terminal Improvements Projects.

Additionally, Section 2.3.1.2 of the report titled, Project Future Growth at LAX, presents airport passenger forecasts for LAX to the year 2045, and over a planning period of 25 years. Considering that planning projections have been completed to this year, it seems reasonable to also analyze aircraft noise in the surrounding communities to 2045 or at least to 20 years beyond the project baseline year (2038).

We also note that project shows the same future growth rate with or without the project under future year conditions. While I&R cannot evaluate noise from future growth without quantitative projections it would seem that because the project is intended to encourage and support growth, future conditions with the project there would be an increase in airport operations over future conditions without the project. Considering this it appears to be useful to establish a study year which is 20 years in the future (2038) to fully analyze the future growth in operations allowed by the project.

Response: The commenter cites three examples of instances in which forecasts were prepared using a time horizon of 20 or more years. Some of these forecasts were prepared in connection with EIRs. Others were prepared in connection with planning studies.

CEQA does not establish a fixed rule or requirement concerning the time horizon to be used in performing an environmental analysis. The time horizon used for a plan often corresponds to the period during which build-out of the plan is anticipated. Similarly, the time horizon for an infrastructure project often focuses on the impacts that will occur when the project is completed and commences operations. For a multi-phase project, completion of the infrastructure may occur some years in the future. No one approach is required. The time horizon used to perform the analysis will necessarily vary depending on the nature of the project, and the time frame within which the project is expected to become operational. The lead agency must therefore use its judgment to determine the appropriate time horizon to use for purposes of analysis. This issue is

analogous to methodological issues concerning how to perform the analysis, such as which data to rely upon and which model or other analytic tool to use.

The examples cited by the commenter illustrate these principles. In each of these examples, the proposed project included improvements and/or approval actions that would not be completed until that 20-year horizon year. Specifically:

• Table 3.3-1 in the Draft EIR for the Amendment to the Normal Y. Mineta San Jose International Airport (SJC) Master Plan lists the "To-Be-Completed Projects in the Airport Master Plan" that includes numerous development projects proposed in "Phase 2 (2028-2037)." The time horizon thus corresponds with the year at which the plan's components are expected to be completed. In addition, the Airport Master Plan is a planning document intended to guide airport development over a span of years, rather than a specific infrastructure improvement.[1]

• The EIR for the Port of Los Angeles TraPac Project, Section 2.1, which is the introduction and project overview to the Project Description, states: "The proposed Project includes a 30-year lease renewal to the year 2038."[2]

• The EIR for the Port of Los Angeles Everport Project, Section 2.2.2 of the Draft EIR, which is project overview, states: "The proposed Project would also extend the terminal's lease by 10 years from 2028 through 2038."[3]

In each of the above examples, the 20-year horizon year evaluated for those projects is not based on "planning projections" as asserted by the commenter, but rather reflects the completion timeframe for each project.

In presenting this information, LAWA does not seek to either question or support the planning horizons used by the SJC Airport or the Port of Los Angeles. Rather, this information is provided to illustrate the variability associated with selecting the appropriate time horizon, depending on the nature of the project. Dozens more examples could be cited. The planning horizons for each would differ, depending on the nature of the project and the circumstances under which it arises. The lead agency has discretion in each instance to decide what sort of planning horizon is appropriate under the circumstances.

To cite one example, in July 2020, the City of Inglewood approved the Inglewood Basketball and Entertainment Center (IBEC), an arena and entertainment venue located approximately four miles east of LAX. The transportation and other analyses in the EIR for the IBEC project focused on conditions that would exist in 2024. This time frame was selected because the IBEC project was scheduled to be constructed and commence operations in time for the 2024-2025 NBA basketball season. This time frame, therefore, corresponded to the horizon within which the project would become operational.[4]

The commenter's request to select a planning horizon later than 2028 is noted. After careful consideration, LAWA had determined that such further analysis is unwarranted. The horizon year of 2028 used in the evaluation of noise impacts and other environmental impacts associated with the proposed LAX Airfield and Terminal

Modernization Project represents the anticipated completion year for the proposed Project. That analysis approach is consistent with the approach used for the SJC Master Plan EIR and the EIRs completed for the two Port of Los Angeles projects cited by the commenter. Notwithstanding the above, LAWA has provided, for informational purposes only, a discussion of potential environmental impacts in 2033 with and without the proposed Project - please see Topical Response TR-ATMP-G-3.

[1] City of San Jose, Draft Environmental Impact Report for Amendment to Norman Y. Mineta San Jose
International Airport Master Plan, Section 3.3 Proposed Modifications to Airport Master Plan Projects, State Clearinghouse No. 2018102020, prepared by David J. Powers & Associates, Inc., November 2019.
[2] Port of Los Angeles, Berths 136-147 (TraPac) Container Terminal Improvements Project Draft Environmental Impact Statement/Environmental Impact Report, June 2007. Page 2-1. Available: https://kentico.portoflosangeles.org/getmedia/f6cb2d2a-352c-476c-b16f-d28e9bf430ad/Chapter_2_Project_Description.
[3] Port of Los Angeles, Berths 226 to 236 (Everport) Container Terminal Improvements Project Draft Environmental Impact Statement/Environmental Impact Report, April 2017. Page 2-7. Available: https://kentico.portoflosangeles.org/getmedia/be9f75ad-38c1-4fe5-87d7-b60a99242b39/04_Everport-DEIS-EIR_CH-2_ProjectDescription_April2017.
[4] City of Inglewood, Inglewood Basketball and Entertainment Center Project Draft Environmental Impact Report, State Clearinghouse No. 2018021056, prepared by ESA and Fehr & Peers, Section 3.0.5, December 2019. Available: http://ibecproject.com/3.0_Introduction_to_the_Analysis.pdf.

ATMP-AL010-216

Comment: Construction Related Aircraft noise increases
Section 4.7.1.2.2 notes that construction improvements to the north airfield would require the short-term (4.5 month) closure of runway 6L-24R (2023) and 6R-24L (2024) and that during these closures, aircraft take off and landings would occur at the remaining three runways. This operational modification would change the aircraft noise contours in surrounding noise sensitive areas, however as stated in the first full paragraph on page 4.7.1-17, the impact of this change was only evaluated qualitatively in the DEIR.

In keeping with the qualitative analysis of this impact (Impact 4.7.1-1 on page 4.7.1-32) the DEIR acknowledges that the temporary runway closures and reassignments would result in temporary increases in areas exposed to noise levels above 65 dBA CNEL but does not define the areas impacted or quantify the resulting noise level increases. Though, on pages 4.7.1-39 through 4.7.1-41, the DEIR discusses the effect of the temporary runway closures on residential areas currently exposed to a CNEL of 65 dBA and above as well as noise sensitive areas which would be newly exposed to levels above 65 dBA due to these changes, it also does not specifically define these areas. The areas effected, the number of noise sensitive uses exposed, and levels at these uses should be

modeled and quantitatively evaluated in the DEIR so that actual impact of these operational changes can be properly evaluated.

Response: The text of Impact 4.7.1-1 on page 4.7.1-32 of the Draft EIR is only a summary of the impacts analysis that is described in greater detail after that summary statement. The more detailed discussion provided on pages 4.7.1-39 through 4.7.1-41 includes descriptions of how arrivals that would normally use Runway 6L-24R would be reassigned to Runway 6R-24L and Runway 7R-25L during the 4.5 month closure of Runway 6L-24R, and also possibly to Runway 7L-25R instead of Runway 6R-24L if needed to provide a better balance between north and south airfields. Within those pages of the Draft EIR is a similar discussion of how departures that normally use Runway 6R-24L would be reassigned to other runways during the 4.5 month closure of that runway. As part of those descriptions, Figure 4.7.1-6 is referenced as a basis to see where noise-sensitive uses, primarily residential development, are already exposed to 65 CNEL and above. As can be seen on Figure 4.7.1-6, the aircraft noise contours that are primarily associated with arrivals, which extend east of the airport, generally align with Runways 6L-24R and 7R-25L, while the aircraft noise contours that are primarily associated with departures, which extend west of the airport, generally align with Runways 6R-24L and 7L-25R. The descriptions on pages 4.7.1-39 through 4.7.1-41 of how arrivals and departures would be reassigned during the temporary runway closures note the fact that the reassignments would be split between the other three runways, which would help to maintain operational balance and efficiency. Given that the reassignment of the arrivals would likely be split between Runway 6R-24L and Runway 7R-25L, and includes the possibility that some of the arrivals would be reassigned to Runway 7L-25R, it is not anticipated that there would be a radical shift in the arrivals contours shown on Figure 4.7.1-6 (i.e., the reassignment of arrivals would not limited to any one runway). Instead, it is more likely that the temporary changes in aircraft noise levels, as associated with operations distributed between multiple runways, would occur within areas already exposed to 65 CNEL and above. As noted in the Draft EIR, there may be some areas that would be newly exposed to 65 CNEL during the 4.5 month period, with such areas being located on the fringes of the existing arrivals contours east of the airport. The above description of how reassignment of arrivals would affect the arrivals contours east of the airport is analogous to how the departures contours generally west of the airport would be affected with the reassignment of departures from Runway 6R-24L to other runways during its 4.5-month closure. The one notable difference with reassignment of departures is, as described on page 4.7.1-40, the ability to reassign departures from Runway 6R-24L to Runway 6L-24R, is limited by the fact that Runway 6L-24R is much shorter than Runway 6R-24L, which, in turn, would limit the ability of certain aircraft to depart on Runway 6L-24R. As such, it is anticipated that the reassignment of departures would mostly go to Runway 7R-25L, which is the primary departures runway in the south airfield, and, as indicated on page 4.7.1-40, the temporary changes in aircraft noise levels associated with such reassignment of departures would largely occur in areas near the southwest edge of LAX.

In summary, the Draft EIR provides sufficient information relative to the general nature and locations of temporary changes in aircraft noise levels during the 4.5-month closures of the respective north runways, and provides an adequate basis to conclude that there

would be significant and unmitigable aircraft noise exposure impacts during those 4.5-month periods

ATMP-AL010-217

Comment: We would further note that though the impact statement again refers to the CNEL metric accounts for sleep disturbance with the use of nighttime penalties, we again believe that the aircraft noise analysis should at least present event-based noise data such as existing and future maximum noise levels, single event levels, and/or time above information for aircraft operations at residential and other noise sensitive uses in the airport vicinity. This data, in combination with this information provided on awakenings, sleep disturbance, and physiological effect of aircraft noise would allow the surrounding communities to be more fully informed as to the potential effects and impacts of aircraft noise.

Response: Please see Topical Response TR-ATMP-N-1 regarding health effects of noise and Topical Response TR-ATMP-N-2 regarding adequacy of the aircraft noise analysis and use of alternative metrics, such as single event metrics.

ATMP-AL010-218

Comment: Mitigation of Construction Related Aircraft noise increases
The DEIR finds that it is not practical or feasible to implement sound attenuation improvements for temporary construction related aircraft noise increases. While this may be true, without quantitatively determining the actual noise exposure and number of noise sensitive uses newly exposed to the heightened noise levels, it does not seem adequate to simply state that mitigation is unfeasible. Once the actual noise impact is established, a more accurate determination of the reasonable and feasible mitigation may be made. If this potential impact is great enough it may be reasonable and feasible to install temporary noise treatment, such as noise barrier blankets at highly affected noise sensitive uses and/or relocate the impacted users during periods of high noise impacts.

Response: The content of this comment is similar to comments ATMP-AL010-84 and ATMP-AL010-216; please refer to Responses to Comments ATMP-AL010-84 and ATMP-AL010-216.

ATMP-AL010-219

Comment: Section 4.7.2 (Traffic Noise)
Environmental Setting
While eight short term traffic noise level measurements were made on the site vicinity, there were no long-term continuous measurements, to establish the diurnal noise patterns in the project area were made. While we understand and have used short term measurement surveys to calibrate traffic noise models long-term reference noise

measurements are also needed to quantify the diurnal trend in noise levels and to establish the peak hour traffic noise levels.

Response: This comment is similar in content to comment ATMP-AL010-93; please refer to Response to Comment ATMP-AL010-93.

ATMP-AL010-220

Comment: Thresholds of Significance
The use of the 3dBA and 5dBA CNEL is appropriate for the evaluation of city street traffic. However, the use a peak hour L increase of 12 dBA (which equate to more than a doubling of traffic noise) is really only appropriate for highway projects and is not commonly used to evaluate traffic noise impacts from non-highway type traffic. Increases of 3 dBA are commonly considered just noticeable, while increases of 6 dBA are considered a substantial change while a 10 dBA change is subjectively heard as approximately a doubling in loudness[6]. Considering this relationship and depending on the background noise environment, we would consider a peak hour Leq increase of 3 to 5 dBA appropriate for the evaluation of traffic noise impacts. With this criterion four of the receivers (R-001G, R-003G, R004G, and R007G) as identified in Table 4.7.2-4 may be exposed to significant traffic noise impact

[6] California Department of Transportation, Technical Noise Supplement (TeNS), Sept.2013, Pg. 2-45 &Table 2-10,

Response: This comment is similar in content to comment ATMP-AL010-94; please refer to Response to Comment ATMP-AL010-94.

ATMP-AL010-221

Comment: Future Year Impacts
As with the Aircraft Noise Impact Analysis, we are surprised that the future analysis study year is only 9 years from the baseline year (2019 current, 2028 future), whereas many large projects include study years which are 20 years in the future so as to avoid a future year too close to the current year once the project is implemented. Also, as with the Aircraft noise Impact Analysis, we note that project shows the same future growth rate with or without the project under future year conditions. As noted in our comments related to aircraft impacts, we have analyzed such (20 year) future noise projections from other large local area infrastructure projects involving roadway traffic from Port of Los Angeles Container Terminal Improvements Projects.

While I&R cannot evaluate noise from future growth without quantitative projections it would seem that since the project is intended to encourage and support growth, there would be greater traffic in under future conditions with the project than future conditions without it. Considering this it appears to be useful to in a study year which is

20 years in the future (2039 or 2038 to be consistent with the Aircraft analysis) to fully analyze the future growth in operations allowed by the project.

Response: Please see Topical Response TR-ATMP-G-3 regarding the reasons why 2028 is the appropriate horizon year for evaluating the impacts of the proposed Project. Please also see Response to Comment ATMP-AL010-215, which addresses the commenter's claims related to the aircraft noise impact analysis for the proposed Project, the analysis horizon years used for evaluating the two Container Terminal Improvement Projects that were specifically referenced in that comment, as well as for evaluating the impacts of the San Jose International Airport Master Plan also cited in the comment, were all based on the estimated completion year of each project. As explained there, the subject analyses did not extend past the completion year of each project but rather reflected the completion timeframe for each project. As such, the horizon year used in the Draft EIR for evaluating impacts associated with the LAX Airfield and Terminal Modernization Project at projected buildout in 2028 is consistent with the approach used in the three examples cited by the commenter.

The comment that the Project is intended to encourage growth is not accurate. Please see Section 2.3.1.2.2 of the Draft EIR. As explained there, the annual activity forecast and regression analysis prepared by LAWA's aviation experts determined that aircraft operations would be the same in 2028 with or without the proposed Project, and that the proposed Project would not result in increased aviation and/or passenger activity levels or capacity at LAX. This analysis is supported by substantial evidence as documented in Appendix B.1 of the Draft EIR. Please see Topical Response TR-ATMP-G-1 for further discussion of the validity of this forecast.

ATMP-AL010-222

Comment: Section 4.7.2 (Construction Noise)
The noise analysis fails to adequately analyze construction noise at noise sensitive receptors surrounding project construction areas due to a lack of establishing of ambient conditions through noise measurements and the use of what appears to be a non-realistic 24-hour average construction noise usage model.

The only method used in the noise analysis to evaluate ambient noise conditions at identified noise sensitive receptors surrounding project construction areas was aircraft noise modeling. While it is understood that aircraft noise in the project area is a primary noise source, there are other localized area noise sources, such as roadway traffic, commercial activities and other area uses which would also be expected to contribute the ambient noise. To determine these actual ambient noise levels, a noise measurement survey at the identified noise receivers should have been undertaken for the hours of the day that project construction activities are expected to take place.

Response: This comment is similar in content to comments ATMP-AL010-86 and ATMP-AL010-87; please refer to Responses to Comments ATMP-AL010-86 and ATMP-AL010-87.

ATMP-AL010-223

Comment: Furthermore, though most of the construction activities will occur on the northern portion of the airport, where all but one of the noise modeling points are located, there will be activities such as construction at Terminal 9 and the repaving of the Taxiway C extension that may affect noise sensitive uses to the south. Accordingly, additional construction noise analysis receptors should be added in these areas.

Response: This comment is similar in content to comment ATMP-AL010-90; please refer to Response to Comment ATMP-AL010-90.

ATMP-AL010-224

Comment: Additionally, the output of the noise modeling is only reported in terms of the CNEL noise metric and not in terms of hourly noise levels. While the Construction Noise analysis does utilize typical source noise levels of construction equipment from the Federal Highway Administration Roadway Noise Construction Model (RCNM), the typical construction noise analyses completed using this model does not report noise levels in terms of a 24-hour average, but in terms of peak hourly average (Leq) or maximum (Lmax) noise levels. Though the construction noise analysis reportedly calculated hourly Leq levels for each construction phase, these levels were not reported and instead a daily CNEL for construction occurring every hour of the day and night were reported.

While, as noted in the DEIR, this daily CNEL construction scenario is very conservative, the DEIR does not report that project construction would actually occur 24-hours a day. Further, if construction activities do occur during nighttime or early morning hours, when ambient noise levels are lower the resulting impact determination may be greater than with the use of the CNEL noise metric. Accordingly, the calculated hourly average and maximum noise level should have been reported and compared to actual (measured) ambient noise conditions at each of the identified noise sensitive receivers during daytime, evening, nighttime, and early morning hours.

Response: This comment is similar in content to comment ATMP-AL010-88; please refer to Response to Comment ATMP-AL010-88.

ATMP-AL010-225

Comment: As requested, Griffin Cove Transportation Consulting, PLLC (GCTC) has completed a review of the "Transportation" section of the Draft Environmental Impact Report (DEIR) completed with respect to the proposed Airfield and Terminal Modernization Project (ATMP Project) at Los Angeles International Airport (LAX) in Los Angeles, California. (Reference: Los Angeles World Airports, Airfield and Terminal Modernization Project – Los Angeles International Airport (LAX) – Draft Environmental Impact Report (Draft EIR), October 2020.) The "Transportation" analysis is presented in DEIR Section 4.8, with

additional, more detailed information provided at DEIR Appendix G. No separate technical report was prepared.

Our review focused on the technical adequacy of the transportation analysis presented in the DEIR, including the detailed procedures and conclusions documented there.

DRAFT ENVIRONMENTAL IMPACT REPORT REVIEW

Our review of the DEIR revealed a number of issues affecting the validity of the transportation analysis results. These issues, which are presented below, must be addressed prior to certification of the environmental document and approval of the proposed ATMP Project.

1. Project Description – DEIR Section 2 - Description of the Proposed Project inadequately describes key components of the proposed ATMP Project's transportation system, including the following:

Project Roadway System
According to the ATMP DEIR (p. 2-39), the project, ". . . would build upon improvements approved as part of the LAX Landside Access Modernization Program . . ." The DEIR (p. 2-10) also refers to "refinements" to the LAMP road system, with the proposed Project's improvements being "integrated with" the LAMP elements. This raises the following questions:

• Will development of the ATMP project, as proposed, eliminate or significantly modify any elements of the previously-approved road system for the LAMP project?
• What specific changes are proposed to the LAMP road system in connection with the ATMP project? A figure is needed to graphically identify the ATMP-proposed changes to the LAX road system, specifically with regard to the approved LAMP roadway system.

Response: Regarding the first paragraph of the comment, Appendix G of the Draft EIR provides the detailed data in support of the transportation analysis presented in Section 4.8 of the Draft EIR. Preparation of a separate technical report is not warranted. The remainder of the comment pertains to the description of the proposed LAX Airfield and Terminal Modernization Project roadway system improvements, particularly as related to the roadway system associated with the approved LAX Landside Access Modernization Program. That portion of the comment is similar to that of comment ATMP-AL010-13. Please see Response to Comment ATMP-AL010-13.

ATMP-AL010-226

Comment: Project Parking System

The number of parking spaces to be provided in the Terminal 9 structure is not stated in the DEIR, nor is there a breakdown of the number of long-term vs. the number of short-term parking spaces.

Response: The content of this comment is similar to comment ATMP-AL010-14; please refer to Response to Comment ATMP-AL010-14.

ATMP-AL010-227

Comment: 2. Vehicle-Miles-Traveled Analysis – The DEIR analysis of vehicle-miles-traveled (VMT) addressed three forms of VMT:

- Daily VMT per Employee: ". . . the average VMT generated by each employee at airport uses on a typical weekday." (DEIR, p. 4.8-9)
- Daily Passenger VMT: ". . . total VMT generated by airport passengers on a typical weekday." (DEIR, p. 4.8-14)
- Induced VMT (Short-Term and Long-Term): ". . . VMT that is unrelated to airport trips, but is rather related to the improved roadway operations on nearby surface streets as a result of the roadway improvements that are part of the proposed Project." (DEIR, p. 4.8-14)

The DEIR concluded that the ATMP Project would cause significant impacts with respect to all three types, and that only VMT per Employee could be mitigated to a Less Than Significant level. Passenger VMT and Induced VMT were determined to be Significant and Unavoidable impacts.

The VMT estimates documented in the DEIR were generated by the LAX Airfield and Terminal Modernization Project Travel Demand Model, which was modified to add roadway system detail, among other modifications. Travel demand forecasting models typically include fairly rudimentary, schematic-level road systems, which do not necessarily reflect the specific details of the existing or proposed road system. For example, multiple driveways serving a number of individual properties might be combined into a single "centroid connector," which is used to load the traffic associated with those land uses onto the regional road system within the model.

The access system proposed to serve the ATMP Project in the immediate vicinity of the LAX Central Terminal Area (CTA) is rather complex requiring, in some cases, substantial "out-of-direction" travel to enter or exit the CTA. It is unclear whether the model's roadway network accurately accounts for the actual ATMP Project travel paths (and the associated distances) required of visitors to LAX. We particularly wonder about the level of precision in the VMT analysis, and the associated level of accuracy. As noted above, implementation of the ATMP Project will modify certain travel paths for traffic entering and exiting the LAX CTA, compared to the approved LAMP Phase 1 roadway system. In some cases, the travel paths proposed for the ATMP Project are substantially longer than would exist under the LAMP Phase 1 plan.

Of particular concern are potential adverse impacts with respect to CTA traffic flowing to and from Sepulveda Boulevard, including traffic to and from the City of El Segundo. Attachments A and B present figures illustrating selected access routings for the ATMP and LAMP projects at LAX, based on information in the respective EIR documents. Included are figures showing the following travel paths for both projects:

- From El Segundo to the CTA via northbound Sepulveda Boulevard (Figures A-1 and A-2),
- From the CTA to El Segundo via southbound Sepulveda Boulevard (Figures A-1 and A-2),
- From southbound Sepulveda Boulevard to the CTA (Figures B-1 and B-2), and
- From the CTA to northbound Sepulveda Boulevard (Figures B-1 and B-2).

From El Segundo to the CTA via Northbound Sepulveda Boulevard

The traffic patterns for vehicles traveling from El Segundo to the CTA vary substantially between the two projects. For LAMP Phase 1, the existing route will continue to be in place, as shown in Attachment A, Figure A-1 using red arrows. That route involves a relatively short ramp that diverges from northbound Sepulveda Boulevard immediately north of the Sepulveda Tunnel and connects directly to the upper and lower level roadways within the CTA.

For the ATMP project, though, drivers will continue northward on Sepulveda Boulevard past the existing ramp (which will be demolished) and exit the road on a new off-ramp beginning at approximately 98th Street, as shown on Figure A-2 in Attachment A (red arrows). The new ramp will curve to the east, following the approximate alignment of 96th Street before curving to the south, then east again at about 98th Street, before curving back to the south along the general alignment of a new "A" Street, and finally curving back to the west to enter the CTA. As indicated by this description, the proposed ramp roadway between northbound Sepulveda Boulevard and the CTA is quite circuitous with several curves, which could potentially create a safety issue.

Based on scaling distances from Google Earth, we estimate that the proposed ATMP routing will add roughly 3,900 feet (0.74 mile) to the travel distance for drivers.

From the CTA to El Segundo via Southbound Sepulveda Boulevard

Traffic exiting LAX and heading south to El Segundo gets to Sepulveda Boulevard much more directly under the LAMP Phase 1 scheme, which employs the existing pair of relatively short ramps leading directly from the outbound (eastbound) CTA road system to southbound Sepulveda Boulevard. (There are two ramps because one originates on the upper level CTA roadway and the other on the lower level CTA roadway.) While upper level CTA traffic connects directly to a ramp leading to southbound Sepulveda Boulevard, traffic from the lower level roadway passes through an existing traffic-signal-controlled intersection to access a ramp leading to that roadway. Figure A-1 in Attachment A illustrates this travel path using blue arrows.

In contrast, with implementation of the ATMP Project, drivers from both CTA levels headed to southbound Sepulveda Boulevard would follow a highly convoluted exit route, which involves traveling east almost past the proposed Terminal 9, then north to

roughly the alignment of existing 98th Street, then west, before eventually heading south and merging onto Sepulveda Boulevard. This travel path is shown using yellow arrows on Figure A-2 in Attachment A. Using Google Earth, we conservatively estimate the total additional travel distance resulting from following that loop at about 5,000 feet (almost 0.95 mile).

In addition, ATMP Project traffic exiting the CTA upper level and headed southbound on Sepulveda Boulevard must go around a loop ramp within the CTA to access the outbound traffic stream. Use of that loop ramp, which is approximately 1,700 feet (0.32 mile) long, would not be necessary under the LAMP Phase 1 scheme.

Consequently, travel time and distance will be substantially greater under the ATMP scheme, which would also equate to an increase in vehicle-miles-traveled (VMT).

From Southbound Sepulveda Boulevard to the CTA

Traffic approaching the CTA from southbound Sepulveda Boulevard would be forced to follow a much more circuitous route under the ATMP Project road system. The LAMP Phase 1 project would provide a direct connection from southbound Sepulveda Boulevard to both levels of the CTA road system via a pair of new ramps, as shown on Figure B-1 in Attachment B (red arrows).

Under the ATMP Project, vehicles exiting southbound Sepulveda Boulevard toward the CTA would first travel east on a circuitous new ramp system beginning at approximately 98th Street, then south at the alignment of the new "A" Street before heading west to approach the CTA along the general alignment of Century Boulevard. This proposed route is illustrated on Figure B-2 in Attachment B (red arrows). Again using Google Earth, we estimate the length of this out-of-direction travel at about 3,200 feet (0.646 mile).

From the CTA to Northbound Sepulveda Boulevard

Drivers exiting the CTA and traveling to the north on Sepulveda Boulevard will also travel substantially farther under the proposed ATMP Project road system. Figure B-1 in Attachment B (blue arrows) shows that, under the LAMP Phase 1 road scheme, such drivers will follow the existing travel path, which involves traversing a loop ramp just outside the CTA and gaining immediate access to northbound Sepulveda Boulevard.

Implementation of the ATMP Project road system will require those same drivers to travel east to approximately the alignment of the new "A" Street, where they will turn to the north before curving back to the west at approximately existing 96th Street, eventually reaching a traffic-signal-controlled intersection at Sepulveda Boulevard. This new routing is illustrated using yellow arrows on Figure B-2 in Attachment B.

Both schemes would require upper level CTA drivers to traverse the internal, 1,700-foot loop ramp within the CTA.

The additional travel distance on the proposed ATMP Project road system is estimated at 1,220 feet (0.23 mile), compared to the LAMP Phase 1 system, based on scaling distances from Google Earth.

CTA Traffic Design Day Demand

DEIR Appendix G presents information describing the characteristics of vehicular traffic at LAX. Of particular interest are Table G.4-7 ("Summary of 2028 Proposed Project Terminal 1 to Terminal 8 Hourly Volumes – Lower Level") and Table G.4-8 ("Summary of 2028 Proposed Project Terminal 1 to Terminal 8 Hourly Volumes – Upper Level") from that appendix (pp. G.4-8 – G.4-9). Those tables present hourly traffic volumes for the CTA upon completion of the ATMP Project on a Friday in August, which was designated as the "design day" for this analysis. The traffic volumes represent activity within the CTA at Terminals 1 – 8 only, excluding Terminal 9. The traffic volumes also reflect completion of the Intermodal Facility (ITF) East, the ITF West, and the Consolidated Rental Car (CONRAC) facility, although traffic associated with those projects generally does not enter or exit the CTA. For ease of reference, those tables are presented here as Attachment C.

Also presented in Attachment C are five spreadsheets derived from the information in those two tables.

Table C-1 illustrates the tabulation of 2028 design day traffic volumes using northbound El Segundo Boulevard to access the CTA. As shown there, a total of 22,418 design day vehicles would approach the CTA using that routing upon completion of the ATMP Project.

Table C-2 summarizes the volume of 2028 design day traffic departing the CTA and heading southbound on Sepulveda Boulevard toward El Segundo. According to Table C-2, a total of 32,490 vehicles per day would exit the CTA and head south on Sepulveda Boulevard (17,902 from the CTA lower level and 14,588 from the CTA upper level).

Table C-3 shows how many upper level exiting vehicles would be required to traverse the internal loop within the CTA to reach either direction of Sepulveda Boulevard. Based on the LAX projections, a total of 25,832 vehicles per day would do so on the 2028 design day upon completion of the ATMP Project. Southbound traffic would represent 14,588 of those vehicles, while 11,244 would be traveling northbound.

Table C-4 summarizes similar calculations for traffic entering the CTA from southbound Sepulveda Boulevard. That table shows that 38,709 vehicles/day are expected to do so.

Finally, Table C-5 summarizes the daily volume of traffic projected to travel from the CTA to northbound Sepulveda Boulevard. A total of 19,333 daily vehicles are expected to follow this routing, with 8,089 from the CTA lower level and 11,244 from the CTA upper level.

As noted above, these traffic volumes do not include activity generated at Terminal 9; those values are presented separately in DEIR Appendix G. Consequently, the traffic

volume numbers presented here are conservative values, as are the estimates of vehicle-miles-traveled presented below.

Vehicle-Miles-Traveled Estimates

As noted above, on the 2028 design day, 22,418 vehicles are expected to enter the CTA from northbound Sepulveda Boulevard. Under the proposed ATMP Project road system, those vehicles will be required to travel an additional 3,900 feet (0.74 mile) compared to the baseline LAMP Phase 1 scheme. This will result in additional VMT of 16,560 miles each day.

A total of 32,490 vehicles per day are expected to travel south on Sepulveda Boulevard from the CTA. Requiring all of these vehicles to traverse the circuitous, 5,000-foot-long (0.95 mile) path described above to get from the CTA to southbound Sepulveda Boulevard will add approximately 30,770 VMT daily, compared to the LAMP road system. This estimate ignores traffic exiting Terminal 9, which will follow essentially the same route; thus, the number is a conservative indication of additional VMT.

Retaining the internal CTA loop ramp that will serve upper level CTA vehicles traveling southbound on Sepulveda Boulevard will add about 4,700 VMT daily, based on 14,588 upper level vehicles traveling 1,700 feet (0.32 mile) around the loop.

Also, 38,709 vehicles per day are projected to approach the CTA from the north via southbound Sepulveda Boulevard. The additional 3,200 feet (0.61 mile) of travel proposed in conjunction with the ATMP Project will result in a daily increase of 23,460 VMT.

The additional VMT associated with drivers traveling the additional 1,220 feet (0.23 mile) from the CTA to northbound Sepulveda Boulevard will add 4,470 VMT, based on a projected 2028 daily traffic volume of 19,333.

Thus, the CTA-area roadway system modifications directly associated with the proposed ATMP Project will add approximately 79,960 VMT daily, in comparison to the approved LAMP Phase 1 road system, which serves as the baseline for this analysis. We believe this value is conservative, as it does not include traffic associated with Terminal 9, some of which will follow travel paths similar to those described above.

In contrast, the DEIR claims that the ATMP Project will result in additional passenger VMT of 32,786 miles/day, which is roughly 40 percent of our estimate based on detailed evaluation of the CTA road system proposed as part of the ATMP Project.

Table 1 summarizes this VMT estimate.

Table 1
Estimated Additional Vehicle-Miles-Traveled
Due To ATMP Project Road System at Central Terminal Area (Terminals 1 – 8)

Travel Path	2028 Design Day Traffic Volume[1]	Approximate Additional Travel Distance[2]	Additional Vehicle-Miles-Traveled
From El Segundo to the CTA via Northbound Sepulveda Boulevard	22,418 Vehicles	3,900 feet (0.74 mile)	16,560 Vehicle-Miles
From the CTA to El Segundo via Southbound Sepulveda Boulevard	32,490 Vehicles	5,000 feet (0.95 mile)	30,770 Vehicle-Miles
CTA Upper Level Loop to Southbound Sepulveda Blvd.	14,588 Vehicles	1,700 feet (0.32 mile)	4,700 Vehicle-Miles
From Southbound Sepulveda Boulevard to the CTA	38,709 Vehicles	3,200 feet (0.61 mile)	23,460 Vehicle-Miles
From the CTA to Northbound Sepulveda Boulevard	19,333 Vehicles	1,220 feet (0.23 mile)	4,470 Vehicle-Miles
		TOTAL	79,960 Vehicle-Miles

Notes:
[1] Reference: DEIR Appendix G, Table G.4-7 ("Summary of 2028 Proposed Project Terminal 1 to Terminal 8 Hourly Volumes – Lower Level") and Table G.4-8 ("Summary of 2028 Proposed Project Terminal 1 to Terminal 8 Hourly Volumes – Upper Level")
[2] Estimated by scaling distances from Google earth

Consideration of the three forms of VMT that were analyzed in the DEIR raises substantial questions as to whether the additional VMT cited here has been accounted for. We can readily conclude that it is not included within the Employment VMT category, as that analysis focused on employee commute trips, which rarely (if ever) involve travel within the CTA. Attachment D presents DEIR Figure 4.8-3 – Driveway Count Locations (DEIR, p. 4.8-13), which ". . . shows the location of public and private passenger parking lots, rental car facilities, employee parking lots, and cargo facilities . . .," none of which are within the CTA. Further, "[t]he average Daily VMT per Employee rate was estimated for parking lots where it was possible to isolate employee counts." (DEIR, p. 4.8-11) Again, this focus on employee parking lots (which are outside the CTA) suggests that the additional VMT described above is excluded from the DEIR's Employment VMT value.

Similarly, we can conclude that it would not be part of the Induced VMT that was derived in the DEIR analysis, as that form of VMT ". . . is unrelated to airport trips, but is rather related to the improved roadway operations on nearby surface streets . . .," as defined above. (DEIR, p. 4.8-14)

Consequently, it must be included (if at all) within the Passenger VMT. The DEIR describes that parameter as follows (DEIR, p. 4.8-14):

The total airport passenger VMT is the sum of all passenger VMT traveling directly to the CTA (as well as to the ITF East and ITF West in the 2028 future year scenarios) and to the major LAX parking facilities.

DEIR Tables 4.8-10 (p. 4.8-41) and 4.8-13 (p. 4.8-51) summarize the results of the VMT analyses. Table 2 below reproduces the Total Passenger VMT data.

Table 2 Total Passenger VMT Summary			
Existing Conditions (2019)	Projected Future Conditions Baseline (2028)	Future Conditions Baseline + Proposed Project (2028)	Proposed Project Incremental Increase
6,581,811	8,676,209	8,708,995	32,786

As shown, the DEIR projects a Project-related increase in Passenger VMT of 32,786. However, as we demonstrated above, the CTA roadway system modifications proposed as part of the ATMP Project will result in a VMT increase of almost 80,000 VMT daily, a difference of over 47,000 VMT daily. Further, as we pointed out above, we believe our estimate is conservative as it includes activity within the CTA only (i.e., Terminals 1 – 8). No Terminal 9 activity is included. Similarly, whereas the DEIR's estimate of passenger VMT (as defined above) includes the ITF East, ITF West, and major LAX parking facilities (presumably including off-site parking facilities), our estimate excludes any locations beyond the boundaries of the CTA, It is, therefore, apparent, that the DEIR substantially understates the VMT-related impacts of the ATMP Project, due to its failure to accurately reflect the vehicular access system proposed to serve the CTA.

Response: The commenter correctly noted that the travel demand models usually do not include all details of roadway network and some of the driveways may be combined as a single centroid connector. However, this simplification does not invalidate the model used or the daily VMT calculations. Travel demand models are currently the best available tools to estimate VMT and City of Los Angeles Transportation Analysis Guidelines (TAG) recommends the use of such a tools.

The commenter states that it is unclear whether the model's roadway network accurately accounted for the proposed Project travel paths (and the associated distances) to LAX. The roadway network in the LAX travel demand model has been accurately constructed to reflect the proposed Project and roadway design elements, such as number of lanes and roadway distances. The new proposed Project roadways would increase travel distance for passengers and visitors accessing the Central Terminal Area (CTA) from Sepulveda Boulevard, as well as those traveling from the CTA to Sepulveda Boulevard. For passengers and visitors accessing the CTA from Century Boulevard, the travel distance would not change under the proposed Project. It is also important to note that about 12 percent of CTA vehicle trips under Projected Future Baseline conditions would be shifted to Terminal 9 under the proposed Project. For these vehicle trips, the travel distance would be shorter.

The commenter also provides a series of calculations based on measuring roadway distances from Google maps and then manually calculating the change in passenger VMT due to the changes in roadway lengths multiplied by the number of design-day trips. The commenter assumes that the proposed Project roadways would only change the very last mile of passenger routes to/from the CTA. The commenter's assumption is too static and simplistic. The proposed Project roadway network would modify substantially access to/from the CTA, as compared to the landside road network approved under Phase 1 of the LAX Landside Access Modernization Program. The commenter's calculations assume that the routes selected by passengers to or from the CTA would

not change as a result of the proposed Project. This assumption is incorrect. With todays' advanced navigation devices, travel patterns are not static and real time travel times (based on delay to drivers) are used to calculate the fastest route between destinations. It is unrealistic to assume travel patterns in the vicinity of LAX, after implementation of the proposed Project, would be exactly the same as projected future baseline conditions. Therefore, travel demand models are used to simulate the change in the travel behavior. The roadway network in vicinity of LAX has multiple ingress/egress points to the area and passengers distribute on multiple routes to access the CTA. It is possible that passengers might use different freeway on-ramp / off ramps or may also change their route from one street to a parallel one based on small changes in travel time. For some passengers, the new route might be longer but quicker in time, and for others the new route might be more direct.

In addition, there are inaccuracies in the data provided in Table 1 of the comment. The VMT estimates have some duplication (double counting) in the vehicle counts. For example, the 14,588 vehicles going from the CTA upper-level loop to southbound Sepulveda Boulevard are already included in the 32,490 for trips from the CTA to El Segundo via southbound Sepulveda Boulevard.

It should also be noted that these input values and approximate route assignments presented in Appendix G.4 for future passenger demand are just a starting point for the modeling process. These numbers are presented in a static format that takes into account the capacity of the roadway system. As described above, however, the effect of travel time, route distance and congestion/delay ultimately determine the best estimate of travel pattern for the passenger activity. The process that the model uses to assign trips is dynamic based on these factors and the tool reaches equilibrium through selecting the shortest travel time paths for trips. Essentially, the commenter's manual calculations do not consider many variables that occur during a trip and are, thus, too simplistic resulting in an overestimate of VMT.

As part of the commenter's discussion of travel routes, the commenter asserts that there is a potential safety issue associated with the proposed roadway ramp between northbound Sepulveda Boulevard and the CTA. The commenter does not provide any evidence regarding why this would create a potential safety issue except for it being "quite circuitous with several curves." The proposed roadway ramps would be designed based on the current best practice design standards and in compliance with the City of Los Angeles design guidelines and procedures.

ATMP-AL010-228

Comment: The VMT analysis must be revised to correct this substantial deficiency, and it must then be recirculated for further public review.

Response: Please see Response to Comment ATMP-AL010-227 regarding the adequacy of the VMT analysis and methodology utilized the Draft EIR. In preparing the Final EIR for the proposed Project, LAWA has reviewed all of the comments received, including comment ATMP-AL010-227, and has carefully considered the responses to these comments and

other information provided in the LAX Airfield and Terminal Modernization Project Final EIR. None of the information provided in the Final EIR meets the criteria for recirculation of an EIR as outlined in Section 15088.5 of the State CEQA Guidelines.

ATMP-AL010-229

Comment: Vehicle-Miles-Traveled Mitigation

The VMT-related mitigation measures include a variety of strategies encompassed within a "VMT Reduction Program," as described in the mitigation measure designated MM-T (ATMP)-1. (DEIR, p. 4.8-52) One of the key VMT reduction strategies delineated in the mitigation measure is the establishment of an "on-demand micro-transit shuttle." According to the DEIR (p. 4.8-53):

. . . LAWA is currently engaged in the development of an employee shuttle in partnership with the City of Inglewood and a separate pilot program in partnership with Metro. The expansion of these pilot programs into full programs, and expansion of the service area beyond the City of Inglewood and the Metro service area, would result in additional reduction of single-occupancy commute trips to LAX from the nearby neighborhoods.

Given that El Segundo borders LAX to the south and is, therefore, closer to the airport than Inglewood, this mitigation measure should be amended to specifically include micro-transit shuttle service serving El Segundo. City of El Segundo representatives should be directly involved in discussions concerning how and where this service would operate within the city.

Response: As discussed on pages 4.8-53 and 4.8-54 of the Draft EIR, the intent of the on-demand micro-transit shuttle service is to provide an alternative transportation option to the automobile for both employees and passengers of LAX. In the implementation of that measure, subsequent to approval of the Project, future on-demand micro-transit service will take into account potential ridership, service areas, density, and other planning tools, as would factor into El Segundo's request to be included as part of an on-demand micro-transit shuttle service.

ATMP-AL010-230

Comment: Further reductions in VMT could potentially be achieved through improved bicycle connections between El Segundo and LAX, as well. Therefore, Mitigation Measure MM-T (ATMP)-1 should be expanded to call for implementation of improvements necessary to facilitate such bicycling activity, particularly for LAX employees residing in and near El Segundo.

Response: Please see Topical Response TR-ATMP-T-2 regarding VMT mitigation measures and monitoring for the LAX Airfield and Terminal Modernization Project. The topical response addresses the additional bicycle connections requested by the commenter between LAX and the City of El Segundo to serve LAX employees. The topical response

also explains that the proposed mitigation strategies identified as part of MM-T (ATMP)-1, VMT Reduction Program, already reduce the impact of employment VMT to a level that is less than significant.

ATMP-AL010-231

Comment: 3. Terminal 9 Access – Vehicles traveling to Terminal 9 and its parking structure from northbound Sepulveda Boulevard will pass through a traffic-signal-controlled intersection on Century Boulevard at the proposed new "A" Street. Traffic from northbound Sepulveda Boulevard to eastbound Century Boulevard will pass though this same intersection, as will eastbound traffic departing the CTA. The DEIR provides no information regarding traffic operations at this location.

Response: As noted by the commenter, vehicles traveling to Terminal 9 from northbound Sepulveda Boulevard would pass through the future intersection of Century Boulevard and the proposed "A" Street (now named Jetway Boulevard). As also noted, that intersection would also accommodate eastbound traffic departing the Central Terminal Area. The west leg of that intersection will include four through lanes and a dedicated right turn lane, with traffic heading to Terminal 9 from northbound Sepulveda Boulevard having approximately one-half mile of stacking/queueing space separate from Sepulveda Boulevard and the benefit of a dedicated right turn lane at the subject intersection. With regard to the commenter's inquiry about operations at this intersection as related to potential traffic congestion, which follows in the subsequent comment (ATMP-AL010-232), please see Response to Comment ATMP-AL010-127 and Topical Response TR-ATMP-T-1 regarding the assessment of transportation effects associated with the LAX Airfield and Terminal Modernization Project that are not subject to CEQA, which was conducted in accordance with the City of Los Angeles Transportation Assessment Guidelines. As indicated therein, traffic operations analysis such as level of service (LOS) and traffic congestion is no longer used as a basis for determining significant transportation impacts under CEQA.

ATMP-AL010-232

Comment: Of particular concern is the possibility that congestion at that location will cause vehicular queues on the eastbound intersection approach to back up onto northbound Sepulveda Boulevard and even into the Sepulveda Tunnel. This raises the following questions:

• Upon completion and occupancy of Terminal 9 and its parking structure, how long will eastbound vehicular queues extend from the traffic signal-controlled intersection referenced above?

Response: Please refer to Response to Comment ATMP-AL010-127 which addresses the issue regarding eastbound queue length. The queue length on the west leg of the intersection of Century Boulevard and Jetway Boulevard would not exceed the storage capacity. In addition, the new connecting road from Sepulveda Boulevard to the Century Boulevard

and Jetway Boulevard intersection would be designed to the applicable Caltrans and City of Los Angeles design standards. Therefore, this new connecting road is not expected to result in a safety issue.

Please also see Topical Response TR-ATMP-T-1 regarding the assessment of transportation effects associated with the LAX Airfield and Terminal Modernization Project that are not subject to CEQA, which was conducted in accordance with the City of Los Angeles Transportation Assessment Guidelines. As indicated therein, traffic operations analysis such as level of service (LOS) and congestion is no longer used as a basis for determining significant transportation impacts under CEQA.

ATMP-AL010-233

Comment: • Will the queues extend onto northbound Sepulveda Boulevard/Pacific Coast Highway, including into the Sepulveda Tunnel?

Response: Please refer to Response to Comment ATMP-AL010-127 which addresses the issue regarding queue length. Please also see Topical Response TR-ATMP-T-1 regarding the assessment of transportation effects associated with the LAX Airfield and Terminal Modernization Project that are not subject to CEQA, which was conducted in accordance with the City of Los Angeles Transportation Assessment Guidelines. As indicated therein, traffic operations analysis such as level of service (LOS), delays, and queues related to traffic congestion is no longer used as a basis for determining significant transportation impacts under CEQA.

ATMP-AL010-234

Comment: • What are the safety impacts on Sepulveda Boulevard/Pacific Coast Highway, particularly with regard to increased collisions on the road due to development of Terminal 9 and its associated traffic?

Response: The commenter asserts that there will be "increased collisions on the road due to development of Terminal 9 and its associated traffic." The commenter does not provide any specific evidence or information in support of this assertion. Section 4.8.5.5 and Appendix G.10 of the Draft EIR present the transportation safety analysis prepared for the proposed Project in accordance with the Los Angeles Department of Transportation Assessment Guidelines. Please refer to Response to Comment ATMP-AL010-127 which addresses the issue regarding queue length and the safety of traffic operation at this location.

ATMP-AL010-235

Comment: Moreover, LAWA indicated that temporary access to Terminal 9 will be provided via direct ramps from northbound Sepulveda Boulevard while the ATMP improvements are

being constructed. Two ramps are proposed, one to the arrivals level and one to the departure level.

• How long will vehicular queues on the temporary inbound ramps (from northbound Sepulveda Boulevard/Pacific Coast Highway to Terminal 9) be?

• Will these queues exceed the lengths of the temporary ramps, thereby extending onto northbound Sepulveda Boulevard and creating a safety issue, particularly with regard to increased rear-end collisions?

Response: Please see Topical Response TR-ATMP-T-1 regarding the assessment of transportation effects associated with the LAX Airfield and Terminal Modernization Project that are not subject to CEQA, which was conducted in accordance with the City of Los Angeles Transportation Assessment Guidelines. As indicated therein, traffic operations analysis such as level of service (LOS) is no longer used as a basis for determining significant transportation impacts under CEQA.

Regarding queue lengths on the temporary access ramps to Terminal 9, the peak hour trips from northbound Sepulveda Boulevard to Terminal 9 is estimated to be 170 during the AM peak period and 190 during the PM peak period. This is very low traffic volume and would not create any queueing issue. According to the queueing analysis prepared as part of the LADOT Non-CEQA transportation analysis completed for the proposed Project separate from the Draft EIR (see Topical Response TR-ATMP-T-1), the 95th percentile queue length for eastbound-right approach at the intersection of Century Boulevard and Jetway Boulevard is only 50 feet during the AM peak period and 175 feet during the PM peak period. The length of the temporary access ramps from northbound Sepulveda Boulevard to the entrance to Terminal 9 is approximately 400 feet.

ATMP-AL010-236

Comment: We are concerned that implementation of these direct ramps from northbound Sepulveda Boulevard to Terminal 9, even on a temporary basis, will exacerbate congested conditions in and near the Sepulveda Tunnel. Beyond further congestion, we envision impacts with regard to safety, including a reasonable likelihood of additional vehicular collisions in this area. Because of this, we believe that other alternatives for construction-period vehicular access to/from Terminal 9 must be considered, specifically with respect to traffic approaching/departing via Sepulveda Boulevard/Pacific Coast Highway in or through El Segundo. Such alternatives should avoid direct access from northbound Sepulveda Boulevard to Terminal 9. Ideally, under all circumstances (i.e., construction period and beyond), Terminal 9 access would be provided via the same set of ramps and roadways that will ultimately serve the CTA upon completion of the ATMP Project.

Response: The commenter asserts that implementation of the temporary ramps from northbound Sepulveda Boulevard to Terminal 9 would exacerbate congested conditions in and near the Sepulveda Tunnel and that there is a reasonable likelihood of additional vehicular collisions in this area. The commenter does not provide any specific evidence or

information in support of this assertion. Notwithstanding, please refer to Response to Comment ATMP-AL010-235 which addresses the issue regarding queue length and the safety of traffic operation at the temporary ramps from northbound Sepulveda Boulevard to Terminal 9.

ATMP-AL010-237

Comment: 4. Construction Impacts – DEIRs typically address the transportation-related impacts that will occur during the proposed Project's construction period. Those analyses generally provide an estimate of the amount of construction-related traffic that will occur, in terms of construction worker commute trips as well as various forms of truck trips (goods/material deliveries, haul trips, etc.).

This DEIR contains no such analysis. Review of the DEIR Table of Contents shows that construction impacts were addressed for most other topic areas, with the only other exceptions being cultural resources and land use and planning. Consequently, the construction-period traffic and parking impacts on El Segundo and surrounding areas were ignored. For comparison, the LAX LAMP project DEIR contained a highly-detailed construction traffic analysis, which encompassed 52 pages.

Response: The content of this comment is similar in nature to the content of comment ATMP-AL010-133; please refer to Response to Comment ATMP-AL010-133.

ATMP-AL010-238

Comment: We note that the LAMP EIR found that that project's construction traffic impacts were significant and unavoidable. (LAMP DEIR, p. 1-20) Had the ATMP Project DEIR conducted the necessary analysis, it would have undoubtedly determined that the ATMP Project's construction-related transportaion impacts would also be significant, thus triggering the requirement for feasible mitigation.

Response: The content of this comment is similar in nature to the content of comment ATMP-AL010-133; please refer to Response to Comment ATMP-AL010-133.

ATMP-AL010-239

Comment: Limited information regarding construction phasing, staging, contractor parking, haul routes, and access during construction is presented in DEIR Section 2.6 (beginning at page 2-77). Temporary access to the CTA and Terminal 9 is addressed at pp. 2-82 – 2-83, including the extensive traffic reroutings that will be necessary. None of this addresses the impacts of the construction activity on traffic operations and safety in the vicinity of LAX, however.

DEIR Section 2.6.2 includes the following statements (p. 2-78):

• To the extent possible . . . employee contractor parking for the proposed Project would be located adjacent to or within the construction sites for the proposed facilities.

• Construction employees could be shuttled between construction sites and construction employee staging/parking areas, if/as warranted.

However, no additional detail is provided. Furthermore, there is no indication how (or if) these measures would be enforced so as to ensure that construction workers park on-site. The use of the word "could" (in "could be shuttled") as opposed to the more definitive "would" or "shall" is concerning. Similarly, the implicit limitation of "if/as warranted" raises concerns. Who will determine if/when this is warranted and what criteria will be applied to make that determination?

The DEIR states that construction activities would be coordinated through a Coordination and Logistics Management (CALM) team to be established by Los Angeles World Airports (LAWA). The functions of the CALM team are spelled out in LAWA's Design and Construction Handbook (DCH)[1], although the membership of that critical in-house organization is not specified. According to the DCH (Division 1 – Page 4 of 68):

The CALM Team's mission statement is to minimize construction-related impacts to passenger service and tenants.

This suggests that the CALM team ignores any construction-related impacts that extend beyond the borders of LAX. We believe that, given the magnitude of the proposed ATMP Project, this is a significant shortcoming.

[1] https://www.lawa.org/en/lawa-businesses/lawa-documents-and-guidelines/lawa-design-and-construction-handbook

Response: As noted by the commenter, temporary access to the Central Terminal Area and Terminal 9 is addressed on pages 2-82 and 2-83 in Section 2.6.5 of the Draft EIR. The description of temporary access in Section 2.6.5 of the Draft EIR provides detailed information on the extent of rerouting of traffic following the demolition of the Sky Way roadway system. As further noted by the commenter, construction staging and contractor parking is discussed in Section 2.6.2 of the Draft EIR. Consistent with the requirements of the State CEQA Guidelines, that section includes a general description of the Project's technical, economic, and environmental characteristics relating to construction staging and contractor parking. (See State CEQA Guidelines, Section 15125 (c).) Based on the information available at this stage of project conceptualization and design, Section 2.6.2 describes employee parking and the potential for shuttling construction employees between construction sites and worker parking areas. (See State CEQA Guidelines, Section 15005 (b)(1).) Moreover, as stated on page 2-82 of the Draft EIR, "in accordance with LAWA procedures, a Site Logistics Plan that identifies construction access and ingress/egress, staging/laydown, etc. would be submitted to the [Coordination and Logistics Management] CALM Team." As discussed in LAWA's Design and Construction Handbook, CALM reviews and approves construction schedules, site

logistics plans, temporary barricade plans, temporary signage plans, project phasing documents, haul routes, and construction materials stockpiles prior to the issuance of a Notice to Proceed for construction projects.[1] Among other requirements, the approved Site Logistics Plan must "[i]dentify point of entrance locations and traffic routes for movement of the contractor's equipment, materials, and workers to the work."[2] Thus, contrary to the commenter's assertion, CALM's construction project review and approval process does not "ignore[] any construction-related impacts that extend beyond the borders of LAX."

It should be noted that the approach described in Sections 2.6.2 and 2.6.3 of the Draft EIR has been used successfully on many construction projects at LAX in providing parking areas at or near construction sites with the use of shuttles to reduce construction worker trips in the local area. Similarly, construction activities for numerous projects at LAX have been successfully coordinated for many years through LAWA's CALM process in minimizing impacts both within and around LAX.

The commenter's request for additional details is noted but cannot be accommodated at this time. Providing the amount of detail requested by the commenter is unrealistic and infeasible. The proposed Project consists of four primary components: runway improvements, Concourse 0, Terminal 9, and landside roadway improvements. The EIR includes information on the timing and phasing of these four components. (Draft EIR, Section 2.6.1.) Construction would occur over an approximately six-year period. Identifying the specific measures that would be taken to address construction-related traffic over a six-year period cannot be accomplished at this time. There is no way to predict what specific traffic conditions will exist five or six years into the future. There is no way to predict what construction-related logistical challenges would be encountered. Final, development construction plans have not been prepared or approved, nor is it feasible to prepare such plans at this stage. (Please see Response to Comment ATMP-AL006-7 regarding the level of detail concerning the proposed Project components.) Construction would proceed in phases over a period of approximately six years. In LAWA's experience, the key to addressing construction-related traffic issues is to put in place a process for identifying and resolving issues as they arise. LAWA's Site Logistics Plan, as administered by the CALM Team, provides such a framework. As noted above, this framework has proven successful in the past, and it is expected to succeed here as well. It should be noted that the City of El Segundo itself does not provide this type of information within EIRs it has recently prepared for development projects of a shorter duration. Within the recent Draft EIR for the Pacific Coast Commons Specific Plan, the City of El Segundo provides only a very vague open-ended statement as to what would happen with parking if the amount of available parking is insufficient to accommodate the demands of shared parking for construction employees and on-site uses that would continue to operate during construction. The EIR simply states: "As described under Development Agreements/Conditions of Approval above, if the total parking demand would exceed the total parking supply during construction activities, the Project applicant/developer would be required to accommodate the excess parking demand at an off-site location and provide shuttle service to and from the Project site accordingly to ensure that that parking is adequately provided during short-term construction activities (Appendix J-2)."[3] However, El Segundo's EIR provides no information as to where such an off-site location might be, or even potential options for such off-site

locations, nor does it provide any information on the number, size/type, frequency, or potential routes for the shuttle service or the length of time that this temporary situation would occur. In comparison to the proposed LAX Airfield and Terminal Modernization Project, the size and nature of the Pacific Coast Commons Specific Plan development proposal is far more simple (i.e., mixed use development with a total of approximately 662,000 square feet of development) and the construction timeframe is much shorter (i.e., 34 months beginning October 2021) at which there should be no reason why the Pacific Coast Commons Specific Plan Draft EIR does not include the type of construction logistics information that El Segundo is demanding be provided in the LAX Airfield and Terminal Modernization Project Draft EIR. As evidenced by El Segundo's own EIR, such detailed information is typically not known at the time of EIR preparation.

The commenter states that the CALM Team focuses exclusively on impacts within the boundaries of LAX. This statement is incorrect. The Site Logistics Plan and CALM Team consider off-site impacts as well.

[1] City of Los Angeles, Los Angeles World Airports, 2020 Design and Construction Handbook (DCH), Version 1.0, Section 4 – Guide Specifications, Division 01 – General Requirements, June 30, 2020. Available: https://www.lawa.org/en/lawa-businesses/lawa-documents-and-guidelines/lawa-design-and-construction-handbook.
[2] City of Los Angeles, Los Angeles World Airports, 2020 Design and Construction Handbook (DCH), Version 1.0, Section 4 – Guide Specifications, Division 01 – General Requirements, June 30, 2020. Available: https://www.lawa.org/en/lawa-businesses/lawa-documents-and-guidelines/lawa-design-and-construction-handbook.
[3] City of El Segundo, Pacific Coast Commons Specific Plan Draft Environmental Impact Report, State Clearinghouse No. 2020050508, Section 4.13, February 2021. Available: https://www.elsegundo.org/home/showpublisheddocument/3264/637498406665030000.

ATMP-AL010-240

Comment: It is essential that a mitigation measure be added to require that the CALM team be expanded to include the City of El Segundo as a key member, to ensure that the City is able to provide necessary input regarding construction-related working hours and days, traffic control plans, construction staging, and contractor parking issues. The CALM team must also include a qualified traffic engineer (licensed by the State of California as a Civil or Traffic Engineer) acceptable to the City of El Segundo, who would be responsible for monitoring construction-related traffic congestion and would have the authority to order timing plan changes for traffic signals within El Segundo and surrounding areas, when necessary.

Response: The content of this comment is similar to comment ATMP-AL010-139; please refer to Response to Comment ATMP-AL010-139. Including a mitigation measure as proposed by the commenter is not required in order to avoid an impact that would otherwise be significant. The requested mitigation is therefore not required under CEQA.

Additionally, as stated in LAWA's Design and Construction Handbook, the CALM team was created by LAWA due to the extensive construction work at LAX and "CALM is focused on coordinating and minimizing the impact of [a] project on the surrounding airport operations."[1] Additionally, as explained in Response to Comment ATMP-AL010-239, CALM reviews and approves construction schedules and plans prior to construction getting underway and has the authority to issue stop work orders should construction activities deviate from approved plans in a way that causes unsafe conditions, or impacts, other tenants, customers, or other construction projects.[2] Thus, the mitigation measure proposed by the commenter is not substantially different from LAWA existing regulatory requirements. (See State CEQA Guidelines, Section 15088.5 (a).)

Although the requested mitigation is not required under CEQA, the request is noted, and will be forwarded to decision-makers for their consideration.

[1] City of Los Angeles, Los Angeles World Airports, 2020 Design and Construction Handbook (DCH), Version 1.0, Section 4 – Guide Specifications, Division 01 – General Requirements, June 30, 2020. Available: https://www.lawa.org/en/lawa-businesses/lawa-documents-and-guidelines/lawa-design-and-construction-handbook.
[2] City of Los Angeles, Los Angeles World Airports, 2020 Design and Construction Handbook (DCH), Version 1.0, Section 4 – Guide Specifications, Division 01 – General Requirements, June 30, 2020. Available: https://www.lawa.org/en/lawa-businesses/lawa-documents-and-guidelines/lawa-design-and-construction-handbook.

ATMP-AL010-241

Comment: In addition, the standard construction period procedures employed by LAWA must be expanded through an additional mitigation measure addressing the dissemination of public information to residents and businesses within El Segundo and other nearby jurisdictions. Establishment and maintenance of a Project-specific website with current construction status information is one measure that should be employed. Also, e-mail and postal updates should be provided on a regular basis to those same areas, including notification of lane closures, detours, hauling activities, etc.

Response: The content of this comment is similar to comment ATMP-AL010-136; please refer to Response to Comment ATMP-AL010-136. LAWA has a lengthy history of performing extensive public notification and outreach regarding construction activities underway at LAX. Additionally, on major construction projects at LAX, LAWA provides a website with extensive information about the project, including construction activities – see, for example, the LAX Landside Access Modernization Program website at https://www.lawa.org/connectinglax. Such a website would also be provided for the LAX Airfield and Terminal Modernization Project.

ATMP-AL010-242

Comment: Finally, LAWA must undertake a process, in coordination with the City of El Segundo, to mitigate haul route pavement damage incurred as a result of the ATMP Project. This process should involve development of a baseline Pavement Condition Index (PCI) for key roadways identified by El Segundo prior to initiation of construction work. (The PCI is a numerical index between 0 and 100, which indicates the condition of a pavement section.) Following completion of the ATMP Project, the PCI evaluation process should be repeated, and LAWA would then be responsible for undertaking any necessary pavement repairs, repaving, or roadway reconstruction, to the satisfaction of the City of El Segundo. During the course of the ATMP Project construction period, LAWA must also respond promptly to City requests for evaluation of specific areas of concern regarding pavement conditions.

Response: The content of this comment is essentially the same as that of comment ATMP-AL010-141; please refer to Response to Comment ATMP-AL010-141, which notes that the commenter's assertion that a process must be undertaken to mitigate haul route pavement damage is unfounded given that no significant impacts related to that issue. The basis for concluding no such significant impacts is explained in Response to Comment ATMP-AL010-133.

ATMP-AL010-243

Comment: 5.Construction Haul Routes – DEIR Section 2.6.3 (p. 2-82) describes the process for establishment of construction haul routes, which consists of two elements: (1) LAWA would submit a Haul Route Form and Haul Route Map to the Los Angeles Department of Building and Safety, and (2) a Site Logistics Plan would be submitted to the LAX CALM Team.

The City of El Segundo should be included as an active participant in the establishment of haul routes and in the review and approval of the Site Logistics Plan, as described in Section 1.2 of the LAWA 2020 Design and Construction Handbook (Division 1 – Page 4 of 68).

Response: The content of this comment is similar to comment ATMP-AL010-139; please refer to Response to Comment ATMP-AL010-139.

ATMP-AL010-244

Comment: 6. Project Trip Generation – The volume of traffic associated with the proposed ATMP Project is summarized in DEIR Table 4.8-7 (p. 4.8-39). A total of 8,190 daily trips are projected. According to the DEIR, only trips associated with the 4,700 estimated new employees in Concourse 0 and Terminal 9 will generate trips. No additional passenger-related trips are assumed. In effect, the assumption is that the proposed ATMP Project is intended to accommodate passenger demand that will occur regardless of whether the ATMP Project is completed; passenger traffic will simply be redistributed within the

airport and no off-site traffic impacts will be associated with those passengers. No support is provided for these assumptions, however.

We find it somewhat ironic that the DEIR touts the ability of the ATMP Project to "improve overall access to and from the CTA" (DEIR, p. 2-39), "reduc[e] traffic congestion on Sepulveda Boulevard" (DEIR, p. 2-39), and "help keep airport-related traffic congestion and back-up off public streets" (DEIR, p. 2-10), but fails to recognize that such improvements (were they to actually materialize) would have the effect of improving the attractiveness of LAX for both airlines and passengers. Further, we believe it is reasonable to expect that the proposed airfield improvements will similarly have the effect of making LAX more attractive to airlines, with the resulting air service enhancements drawing more passengers to LAX. These factors will clearly result in additional vehicular traffic, which has not been addressed in the DEIR.

Response: The commenter correctly states that the proposed Project improvements would accommodate passenger demand that would occur with or without the proposed Project improvements, as documented in Section 3 of Appendix B.2 of the Draft EIR. As described in Section 4.8 of the Draft EIR, transportation impacts associated with implementation of the proposed Project are addressed in terms of vehicle miles traveled (VMT). VMT is a combination of the number of trips multiplied times trip lengths. The analysis of passenger-related VMT accounts for passenger-related trip generation in 2028 (i.e., the number of trips), which would be the same with or without the proposed Project and, as shown on Figure 4.8-4 of the Draft EIR, the locations of passenger trips throughout the greater Los Angeles region (the trip lengths). As such, the transportation impacts analysis presented in the Draft EIR accounts for impacts outside of the airport, which includes, relative to passenger trip lengths, the additional 5.8 lane miles that are associated with the proposed roadway system improvements that would occur outside of the Central Terminal Area.

The content of the second paragraph of this comment is substantively the same as Comment ATMP-AL010-109. Please see Response to Comment ATMP-AL010-109.

ATMP-AL010-245

Comment: Although the DEIR trip generation estimate accounts for the various travel modes to be used by employees (vanpool, carpool, walk/bike/transit, and drive alone), all employees are assumed to make only 2.0 trips per day – one from home to work and the return trip home. None of the employees are assumed to make a trip during the course of a work day (e.g., to attend an off-site meeting, eat lunch, or perform a work-related errand). Again, no support is provided for this assumption.

Response: The commenter states that the Draft EIR trip generation estimate accounts for various employee travel modes (vanpool, carpool, walk/bike/transit, and drive alone), but asserts that there is no support for assuming all employees make only 2.0 trips per day—one from home to work and the return trip home.

As described in Section 4.8.2.2.3, Methodology for Assessing VMT Impacts, of the Draft EIR and consistent with both the LADOT Transportation Assessment Guidelines and the guidance set forth by the Governor's Office of Planning and Research (OPR)[1], for employees the commute VMT (the trip between home and work location) should be accounted for in the transportation impact analysis. The threshold of significance for employee VMT impacts is based on the incremental difference between average VMT per employee with implementation of the Project and average VMT per employee under baseline conditions. As indicated in Section 4.8.5.2.1 of the Draft EIR, the Project-related impact to employee VMT is primarily related to the additional 4,700 employees that would occur with the operation of Concourse 0 and Terminal 9 that would otherwise not occur under baseline conditions. Other non-commute trips, such as off-site meetings, eating lunch, and performing work-related errands, would occur under both Project conditions and baseline conditions.

[1] State of California, Governor's Office of Planning and Research, Technical Advisory on Evaluating Transportation Impacts in CEQA, December 2018.

ATMP-AL010-246

Comment: The ATMP Project trip generation estimate also ignores any non-employee trips that will certainly be associated with the new concourse and terminal facilities. Such trips might be additional deliveries, service trips, etc.

Response: The trip generation for the proposed Project is based on total in/out volumes to the CTA and new Terminal 9. A detailed description of trip generation categories is presented in Appendix G, Tables G.4-7, G.4-8, G.4-9, and G.4-10, of the Draft EIR. The additional delivery or service-related trips described by the commenter are captured in the higher private vehicle trip generation volumes which use the passenger growth rates. Because these trips cannot be disaggregated to a lower growth rate vehicle type such as shuttles or employee trips, the trip generation model estimates for any future delivery or service-related trips are considered conservative since they are increased at the rate of passenger growth. As a result, the full trip generation of the airport is represented and appropriately analyzed in the Draft EIR.

ATMP-AL010-247

Comment: No estimate of peak-hour trips is presented, although DEIR Appendix G presents estimates for the following time periods (which were used in the travel demand forecasting model employed in the analysis):

- AM peak period (6:00 – 9:00 AM),
- Midday period (9:00 AM – 3:00 PM),
- PM peak period (3:00 – 7:00 PM), and

• Night-time period (7:00 PM – 6:00 AM).

Historically, peak-hour traffic volumes represented the most basic element in a traffic impact analysis. For an analysis based on vehicle-miles-traveled (VMT), such as this one, peak-hour volumes are unnecessary. However, this information still provides a valuable perspective with regard to local traffic impacts, and is needed to determine the specific project-related impacts on the El Segundo road system, during the construction period and beyond. This is discussed in greater detail later in this letter.

Response: The commenter correctly points out peak-hour trips are not presented in the Draft EIR for the purpose of analyzing traffic impacts. As the commenter notes, the peak hour volumes are unnecessary for VMT analysis. The California Natural Resources Agency adopted the recommended Office of Planning and Research VMT guidelines on December 28, 2018, which effectively removed congestion as an environmental impact. Specifically, the State CEQA Guidelines state that, with one exception not relevant here, "a project's effect on automobile delay shall not constitute a significant environmental impact." (See State CEQA Guidelines Section 15064.3 (a).) Moreover, as the commenter acknowledges, detailed trip generation for each peak period is presented in Appendix G.5 of the Draft EIR. As stated in Topical Response TR-ATMP-T-1, a non-CEQA transportation assessment has been completed for the proposed Project in alignment with criteria and methodologies provided in the LADOT Transportation Assessment Guidelines. The outcomes of the non-CEQA analysis do not directly pertain to the environmental impacts of the proposed Project and are entirely separate from the Draft EIR.

Regarding construction traffic impacts on neighborhood streets, Section 4.8.1 of the Draft EIR states that the proposed Project would be required to follow LAWA's Design and Construction Handbook, which specifies that a Logistic Plan and fully documented Logistical Work Plan Checklist be developed for construction projects. The Site Logistic Plan will establish construction haul routes and other operational requirements, such as times of day hauling is permitted. Furthermore, staging areas and work zone setups would comply with all applicable permitting requirements including, but not limited to, California Department of Transportation (Caltrans), City of Los Angeles Public Works and Department of Transportation, and the requirements set forth in the California Manual of Uniform Traffic Control Devices (MUTCD).

ATMP-AL010-248

Comment: In order to ensure full understanding of the ATMP Project and its impacts on the nearby road system, the DEIR must reveal the projected vehicular traffic demand to be generated by the overall ATMP Project, as well as by Terminal 9 and Concourse 0 individually. Those trip generation estimates should represent the following time periods:

• Daily,

• AM peak hour (inbound, outbound, and total, during the busiest one-hour period between 7:00 and 10:00 AM),

• Midday peak hour (inbound, outbound, and total, during the busiest one-hour period between 10:00 AM and 2:00 PM), and

• PM peak hour (inbound, outbound, and total, during the busiest one-hour period between 3:00 and 6:00 PM).

Response: The commenter states that it is necessary for the Draft EIR to reveal the projected traffic demand to understand the Project's impacts on the nearby road system, and specifically states that the peak AM, Midday, and PM peak hour trip estimates should be included in the Draft EIR. The California Natural Resources Agency adopted the recommended Office of Planning and Research VMT guidelines on December 28, 2018, which effectively removed traffic congestion as an environmental impact. Specifically, the State CEQA Guidelines state that, with one exception not relevant here, "a project's effect on automobile delay shall not constitute a significant environmental impact." (See State CEQA Guidelines Section 15064.3(a).) In any case, detailed trip generation for each peak period is presented in Appendix G.5 of the Draft EIR. The LADOT Transportation Assessment Guidelines does not required peak hour trip generation for VMT analysis.

As stated in Topical Response TR-ATMP-T-1, a non-CEQA transportation assessment has been completed for the proposed Project in alignment with criteria and methodologies provided in the LADOT Transportation Assessment Guidelines. The outcomes of the non-CEQA analysis do not directly pertain to the environmental impacts of the proposed Project and are entirely separate from the Draft EIR.

ATMP-AL010-249

Comment: 7.Traffic Operations – We understand that under SB 743 the currently-accepted mode of transportation analysis for CEQA documents considers vehicle-miles-traveled (VMT), in place of the traditional approach that addresses intersection and roadway level of service (LOS)[2]. This does not preclude consideration of LOS analyses, where appropriate, however. Of particular concern are traffic operations at certain key off-site intersections and freeway segments where it is reasonable to expect that the proposed ATMP Project would adversely impact quality of life for El Segundo residents and others.

Intersection Impacts
For perspective, we note that the LAX LAMP traffic analysis presented detailed level of service analyses for the following 15 intersections, which are under the sole or joint jurisdiction of the neighboring City of El Segundo:

• Vista del Mar/Grand Avenue,

• Main Street/Imperial Highway,

• Sepulveda Boulevard/Imperial Highway,

- Sepulveda Boulevard/Mariposa Avenue,
- Sepulveda Boulevard/Grand Avenue,
- Sepulveda Boulevard/El Segundo Boulevard,
- Sepulveda Boulevard/Rosecrans Avenue,
- Nash Street/I-105 Westbound Ramps/Imperial Highway,
- Nash Street/El Segundo Boulevard,
- Douglas Street/Imperial Highway,
- Douglas Street/El Segundo Boulevard,
- Aviation Boulevard/Imperial Highway,
- Aviation Boulevard/West 120th Street,
- Aviation Boulevard/El Segundo Boulevard, and
- Aviation Boulevard/Rosecrans Avenue.

Tables 1 – 3 in Attachment E summarize the level of service results for those locations under AM, midday, and PM peak hour conditions for each of the analysis scenarios addressed in the LAMP traffic study. Intersections that were found to operate at LOS E or F (i.e., at or beyond capacity) are highlighted in yellow. Under City of El Segundo policy, intersections are required to operate at LOS D or better, so the highlighted intersections represent unacceptable operations and violations of city policy.

Five of the fifteen intersections were found to operate at LOS E or F in one or more analysis scenarios in the AM peak hour in the LAMP analysis. In the PM peak hour, nine of the locations were found to do so. This suggests a reasonable likelihood that a development of the magnitude of the proposed ATMP Project would have a significant adverse impact on intersection operations in El Segundo. However, the DEIR has ignored this possibility.

We note that it is the policy of the City of El Segundo to require level of service analyses for the purpose of assessing traffic impact fees. It would be appropriate, therefore, for the DEIR to incorporate such analyses to ensure that ATMP Project impacts are fully mitigated within the city. Those analyses should address the specific operational impacts of the ATMP Project, in terms of congestion, vehicular delay, level of service, and queuing at the 15 intersections referenced above.

[2] Intersection and roadway operations have traditionally been described in terms of level of service (LOS), which is reported on a scale from LOS A (representing free-flow conditions) to LOS F (which represents substantial congestion and delay). Capacity is defined to occur at LOS E.

Response: This comment is similar to comment ATMP-AL010-106 with more specifics regarding LOS analysis for 15 intersections in City of El Segundo. Please see Response to Comment ATMP-AL010-106 and Topical Response TR-ATMP-T-1 regarding the assessment of transportation effects associated with the LAX Airfield and Terminal Modernization Project that are not subject to CEQA, which was conducted in accordance with the City of Los Angeles Transportation Assessment Guidelines. As indicated therein, level of service is no longer used as a basis for determining significant impacts under CEQA. Please also see Response to Comment ATMP-AL010-133 regarding other claims, such as related to the traffic analysis completed for the LAX Landside Access Modernization Program.

The commenter also notes that it is the policy of the City of El Segundo to require level of service analyses for the purpose of assessing traffic impact fees. That policy and provisions for assessing traffic impact fees are applicable to development projects proposed within the City's jurisdiction, which is not the case for the proposed LAX Airfield and Terminal Modernization Project. Regardless, assessing transportation impacts in terms of LOS is not a CEQA issue required for analysis in the Draft EIR.

ATMP-AL010-250

Comment: Freeway System Impacts

The DEIR has also ignored the impacts of the proposed ATMP Project on the freeway system, as the "freeway safety analysis" included in the DEIR did nothing to address operational or safety conditions on the freeway mainline. Referring again to the LAX LAMP EIR, which included an analysis of the now-defunct Congestion Management Program road network, we see that 46 freeway segments in the vicinity of the ATMP Project were examined (i.e., each direction of 23 individual segments). Of those, 26 were found to operate at LOS E or F in the AM peak hour under 2035 Future with Project conditions. In the PM peak hour, 23 such segments were identified. Again, this suggests a need to evaluate the potential impacts of the ATMP Project on the freeway system serving LAX and surrounding jurisdictions.

Response: As mentioned in the comment, the Congestion Management Program (CMP) is no longer required by the local agencies as part of the CEQA review process, and neither Caltrans nor the City of Los Angeles have CEQA guidance requiring the evaluation of the operating conditions of the freeway mainline. Moreover, as noted by the commenter, Section 4.8.2.4.2 of the Draft EIR describes the methodology for the Freeway Safety Analysis based on guidance from the Los Angeles Department of Transportation (LADOT). Section 4.8.5.5.1 of the Draft EIR analyzes the Project's potential for freeway safety impacts. The Draft EIR found that only one freeway off-ramp (I-405 Northbound at Century Boulevard) met the screening threshold in LADOT's guidance, analyzed the Project's potential to

cause a freeway safety impact, and concluded the impact would be less than significant. (See pages 4.8-59 through 4.8-60.) Please see Topical Response TR-ATMP-T-1 regarding the assessment of transportation effects associated with the LAX Airfield and Terminal Modernization Project that are not subject to CEQA, which was conducted in accordance with the City of Los Angeles Transportation Assessment Guidelines. As indicated therein, traffic congestion and LOS is no longer used as a basis for determining significant transportation impacts under CEQA in California.

ATMP-AL010-251

Comment: The analysis of freeway operations should also address whether implementation of the ATMP Project will encourage drivers to use Sepulveda Boulevard/Pacific Coast Highway as an alternative to I-405. That is, will the ATMP Project cause sufficient congestion on the freeway to divert drivers to the nearby arterial roads? Such an analysis must, of course, consider the effects of the widespread use of cell phone apps (such as Waze, Google Maps, and others) and in-car navigation systems, which often encourage drivers to divert to alternative routes.

Response: Please refer to Response to Comment ATMP-AL010-250 regarding the question concerning freeway analysis. It is likely that many of the trips made by both passengers and employees to/from LAX will be informed by GPS and travel-based apps such as Google Maps, Waze, etc. As discussed in Section 4.8.2.2.1 of the Draft EIR, the Project Travel Demand Model used in the transportation analysis conducted for the proposed Project based the airport passenger and employee travel patterns on two different sources of "Big Data "or cell phone probe data: first data provider Teralytics provided information on the origin-destination patterns of both passengers and employees; second data provider StreetLight provided data that was used to help with vehicle routing to/from and around LAX. (see also Appendix G.11) The "Big Data," coupled with empirical counts, were used to estimate both LAX passenger and employee vehicle trips and subsequent VMT.

The use of "Big Data" within the analysis framework accounts for the congestion in the roadway system when evaluating VMT for the airport and the proposed Project. Additionally, the travel model used for the transportation analysis was calibrated using the "Big Data" described above, and is sensitive to congestion and vehicle speeds during the assignment routine component of the model. Therefore, the drivers making the trips to/from the airport typically use the paths of travel with the shortest travel time, which splits the majority of traffic between the I-405 freeway and Sepulveda Boulevard/Pacific Coast Highway.

Additionally, please see Topical Response TR-ATMP-T-1 regarding the assessment of transportation effects associated with the LAX Airfield and Terminal Modernization Project that are not subject to CEQA, which was conducted in accordance with the City of Los Angeles Transportation Assessment Guidelines. As indicated therein, traffic congestion and LOS is no longer used as a basis for determining significant transportation impacts under CEQA in California.

ATMP-AL010-252

Comment: Midday Analysis

The analysis of the ATMP Project's traffic impacts should not be limited to the typical AM and PM peak hour periods. The LAX LAMP DEIR (Figure 4.12.1-4) illustrates the pattern of arriving and departing passenger volumes over the course of an entire day. Those patterns are closely linked to the traffic patterns of LAX as a whole. LAMP DEIR Figure 4.12.1-4 (presented here as Attachment F) shows a distinct peak in existing passenger arrival and departure activity at about 11:00 AM. A similar pattern is illustrated in LAMP DEIR Figures 4.12.1-8 and 4.12-9, which show projected hourly passenger activity in 2024 and 2035, respectively. In fact, the midday peak is clearly higher than the total passenger activity shown in the AM (7:00 - 9:00 AM) and PM (4:00 - 6:00 PM) peak periods.

In short, the need for a midday traffic analysis is not inconsequential, given the LAX activity patterns. In fact, the 2014 Traffic Generation Report for LAX, which is referenced in the LAMP DEIR, specifically refers to ". . . the airport peak hour of 11 am to noon." (Reference: Los Angeles World Airports, Traffic Generation Report - Los Angeles International Airport / August 2014, December 2014, p.1). The most recent version of that report (for August 2019, published in November 2019) also refers to ". . . the 11 am to noon airport peak hour." (p. 1) This is further illustrated in LAMP DEIR Table 4.12.2-4 (also in Attachment F), which summarizes the existing trip generation at LAX, as follows:

- AM Peak hour: 12,338 vehicle-trips,
- Midday peak hour: 16,097 vehicle-trips, and
- PM peak hour: 12,840 vehicle-trips.

As shown, the volume of traffic generated at LAX in the midday peak hour is 25 – 30 percent higher than either the AM or PM peak hours.

Response: As stated in Section 4.8.2.2 pf the Draft EIR, total daily VMT generated by passengers and employees were estimated and required for evaluating transportation impacts of the proposed Project. By focusing on total daily VMT, the analysis encompasses the entire day, including the period between 11 a.m. and noon. The transportation analysis was comprehensive and covers all airport-related trips during the day.

The California Natural Resources Agency adopted the recommended Office of Planning and Research VMT guidelines on December 28, 2018, which effectively removed congestion as an environmental impact. As stated in Topical Response TR-ATMP-T-1, a non-CEQA transportation assessment has been completed for the proposed Project in alignment with criteria and methodologies provided in the LADOT Transportation Assessment Guidelines. The outcomes of the non-CEQA analysis do not directly pertain to the environmental impacts of the proposed Project and are entirely separate from the Draft EIR.

The commenter references the 2014 Traffic Generation Report for LAX and the LAX Landside Access Modernization Program Draft EIR. Both of these reports were prepared at a time when, under CEQA, traffic analysis focused on traffic congestion, measured as "level of service," or LOS. LOS analysis focuses on the degree of congestion during the peak hour of traffic flow. Traffic congestion is no longer considered an environmental impact for purposes of CEQA. The approach taken in those reports is therefore no longer relevant to an EIR prepared under CEQA. At that time, however, the approach made sense. That is because traffic congestion analysis focused on periods when vehicular traffic is at peak levels. In most instances, peak traffic occurs during the a.m. and p.m. commuting hours. Traffic levels at LAX may depart from this general rule, however, as the reports cited by the commenter illustrate. Because transportation analysis now focuses on vehicle miles traveled, the relevant metrics are the number of vehicular trips, and the lengths of those trips, measured over the course of an entire day. Those are the metrics upon which the LAX Airfield and Terminal Modernization Project EIR focuses. As a result of the shift in State law and guidance from OPR and LADOT, peak-hour analysis is no longer the focus of transportation analysis under CEQA.

ATMP-AL010-253

Comment: 8. Freeway Safety Analysis – The inappropriately named freeway safety analysis (beginning at DEIR 4.8 p. -59) is limited to consideration of whether vehicular queues on freeway off-ramps serving the ATMP Project will extend all the way back onto the freeway mainline, thereby creating the potential for rear-end collisions. Seven off-ramps were evaluated, but only one (I-405 Northbound/Century Boulevard) was found to have 25 or more Project-generated trips in the AM or PM peak hour. (This suggests that, contrary to information presented elsewhere, peak-hour trip generation estimates were developed for the ATMP Project.) We have the following specific comments regarding this analysis.

Response: The freeway safety analysis beginning on page 4.8-59 of the Draft EIR is appropriately and correctly named in accordance with the LADOT Interim Guidance for Freeway Safety Analysis, and the subject analysis presented in the Draft EIR was completed in accordance with applicable LADOT requirements.[1] The commenter incorrectly asserts that the proposed Project "will extend all the way back onto the freeway mainline" but provides no substantial evidence or empirical data to justify this assertion.

The commenter correctly points out that seven freeway off-ramps were evaluated, but only one of those off-ramps passed the initial screening test of adding 25 or more trips during the AM or PM peak hour. This approach is consistent with LADOT Interim Guidance for freeway safety analysis, which states that such an analysis should "[i]dentify the number of Project trips expected to be added to nearby freeway off ramps serving the site. If the Project adds 25 or more trips to any off ramp in either the morning or afternoon peak hour, then that ramp should be studied for potential queueing impacts following the steps below. If the project is not expected to generate more than 25 or more peak hour trips at any freeway off-ramps, then a freeway ramp analysis is not required."[2] Under these screening criteria, one of the seven off-ramps was identified for additional, detailed modeling; the other six off-ramps were below the

screening criteria. The AM and PM peak hour vehicle trip assignments were obtained from the ATMP travel demand model. Trip generation for AM and PM peak periods for all scenarios are presented in Appendix G.5 of the Draft EIR.

[1] City of Los Angeles, Department of Transportation, LADOT Transportation Assessments – Interim Guidance for Freeway Safety Analysis, May 1, 2020. Available: https://ladot.lacity.org/sites/default/files/2020-06/ladot-tag-interim-freeway-safety-analysis-guidance-may-2020-2.pdf.
[2] City of Los Angeles, Department of Transportation, LADOT Transportation Assessments – Interim Guidance for Freeway Safety Analysis, page 2, May 1, 2020. Available: https://ladot.lacity.org/sites/default/files/2020-06/ladot-tag-interim-freeway-safety-analysis-guidance-may-2020-2.pdf.

ATMP-AL010-254

Comment: Traffic Volumes are Suspect

The off-ramp traffic volumes used in the analysis are suspect. As an initial matter, it is difficult to believe that only one of the freeway off-ramps serving LAX will have 25 or more Project-related peak-hour trips. Because the ATMP Project's peak-hour trip generation estimates were not revealed in the document, it is impossible to verify this conclusion.

Response: Please refer to Response to Comment ATMP-AL010-253 regarding freeway off-ramp analysis. Peak period trip generation tables are included in the Appendix G.5 of the Draft EIR (see Tables G.5-5, G.5-7, G.5-9, and G.5-11). The analysis was conducted by applying an AM and PM peak hour factor to the peak period trip generation. The peak hour factors are estimated using hourly freeway volumes from Caltrans Performance Measurement System (PeMS) database for year 2019. The freeway ramp screening analysis was completed in accordance with the requirements of the Los Angeles Department of Transportation. The analysis was performed by Fehr & Peers, which has extensive expertise performing such analyses. The commenter does not provide alternative data or guidance. Based on this information, the identification of the one freeway off-ramp for the more detailed queueing analysis is appropriate and supported by substantial evidence.

ATMP-AL010-255

Comment: As shown in Table 3 below, the right-turn off-ramp volumes (i.e., NBR) in the 2028 Baseline scenario are 90 - 95 percent lower than the Existing right-turn volumes. Specifically, in the AM peak hour, the northbound right-turn volume is shown to decline from 308 existing vehicles to 14 vehicles in the 2028 Baseline scenario, a reduction of 294 vehicles. In the PM peak hour, that right-turn movement is reduced from 394 vehicles (existing) to 38 vehicles (2028 Baseline), a difference of 356 vehicles. The 2028

Baseline + Project right-turn volumes are even lower than the 2028 Baseline volumes, improbably suggesting that implementation of the ATMP Project will cause a reduction in traffic on that movement.

Table 3
Traffic Volume Comparison
I-405 Northbound Off-Ramp/Century Boulevard

	Existing		2028 Baseline		Base - Existing		Base + Project		Project Only	
	AM	PM	AM	PM	AM	PM	AM	PM	AM	PM
NBL	1,177	518	1,284	1,148	107	630	1,310	1,163	26	15
NBR	308	394	14	38	-294	-356	11	28	-3	-10
EBL	18	20	18	20	0	0	18	20	0	0
EBT	510	1,750	1,152	2,056	642	306	1,159	2,154	7	98
EBR	189	557	189	557	0	0	189	557	0	0
WBT	1,652	790	1,968	1,479	316	689	1,998	1,505	30	26
WBR	7	10	7	10	0	0	7	10	0	0

NBL = Northbound Left Turn NBR = Northbound Right Turn
EBL = Eastbound Left Turn EBT = Eastbound Thru EBR = Eastbound Right Turn
WBT = Westbound Thru WBR = Westbound Right Turn

The only possible explanation for the reduction from Existing to 2028 Baseline conditions is that a significant roadway system modification is assumed that would divert traffic away from the northbound off-ramp; no such modification is described in the DEIR, however. Beyond this, it is difficult to imagine why addition of the ATMP Project traffic would result in a further reduction in the off-ramp volumes.

Response: The commenter points out that there appears to be an issue with the northbound right turn volumes at the northbound I-405 and Century Boulevard off-ramp. The commenter states that the only potential explanation for the reported volumes is that the analysis assumed unspecified traffic improvements that would divert traffic away from this off-ramp. In fact, the data cited by the commenter does appear to be anomalous, in that traffic volumes estimated for this off-ramp are lower in 2028 than they are under existing conditions. The analysis did not, however, assume unspecified traffic improvements that would divert traffic away from this off-ramp. Instead, an error was made in entering data on traffic volumes when the queuing analysis was performed. Specifically, upon further investigation, it was determined that some of the volumes for this intersection were not correctly entered into the analysis software. This error was inadvertent. The error has been corrected, and the modeling of queue lengths at this off-ramp has been updated. The revised volumes, reflecting correct estimates of traffic volumes in 2028, are presented in Table 1 below. The estimates that appeared in the Draft EIR are shown in strike-through text (i.e., ~~strike-through~~); the revised estimates, based on corrected data, are shown in *italics and underlined text*.

Table 1
Northbound I-405 and Century Boulevard off-ramp Revised Turning Volumes

Scenario	Peak Hour	NBL	NBR	EBR	EBL	EBT	WBT	WBR
Existing Conditions (2019 Counts)	AM	1,177	308	189	18	510	1,652	7
	PM	518	394	557	20	1,750	790	10
Projected Future Baseline Conditions (2028)	AM	~~1,284~~ *1,350*	~~14~~ *310*	~~189~~ *190*	~~18~~ *20*	~~1,152~~ *900*	~~1,968~~ *2300*	~~7~~ *10*
	PM	~~1,148~~ *660*	~~38~~ *400*	~~557~~ *580*	20	~~2,056~~ *2,240*	~~1,479~~ *1,200*	10
Proposed Project Conditions (2028)	AM	~~1,310~~ *1,380*	~~11~~ *310*	~~189~~ *190*	~~18~~ *20*	~~1,159~~ *910*	~~1,998~~ *2,330*	~~7~~ *10*
	PM	~~1,163~~ *680*	~~28~~ *400*	~~557~~ *580*	20	~~2,154~~ *2,340*	~~1,505~~ *1,230*	10

The corrected turning volumes were subsequently re-run in the Synchro queuing model software to ascertain their effect on the off-ramp queue lengths. The resulting analysis showed the queue lengths on the off-ramp are greater than those presented in the Draft EIR. Table 2 presents the results of the revised queuing analysis. As shown in the table, the freeway off-ramp queue does not exceed the storage length in any scenario or time-period. As a result, the proposed Project is not considered to have a substantial effect at the analyzed location and is also not considered to have a negative effect on traffic safety. Therefore, these revised numbers do not result in a significant impact and the conclusion reached in the Draft EIR does not change.

Table 2
Revised Summary of Freeway Ramp Queueing Analysis fo
Existing Conditions, Projected Future Conditions Baseline (2028), and Proposed Project (2028)

Location	Ramp Storage Length (feet)	Time Period	Existing Conditions (2019)		Projected Future Conditions Baseline (2028)		Proposed Project (2028)	
			95th Percentile Queue Length (ft)	Substantial Effect?	95th Percentile Queue Length (ft)	Substantial Effect?	95th Percentile Queue Length (ft)	Substantial Effect?
I-405 Northbound Century Boulevard Off-Ramp*	1,260	AM	325	No	~~375~~ *400*	No	~~400~~ *425*	No
		PM	275	No	~~425~~ *300*	No	~~425~~ *300*	No

Source: Fehr and Peers, 2021.

* Queue lengths are rounded up to the nearest 25 feet.

Please see Chapter F3, Corrections and Clarifications to the Draft EIR, for revisions to Section 4.8.5.5 and Appendix G.9 (revised synchro worksheets for the queue analysis).

ATMP-AL010-256

Comment: It is also difficult to understand why the northbound I-405 on-ramp volumes (i.e., EBR in the table) are unchanged in either the 2028 Baseline or Baseline + Project scenarios. Substantial growth is projected on the eastbound and westbound thru movements at the intersection. There is simply no rational explanation for these anomalies.

Response: The commenter asserts that there is no rational explanation as to why the northbound on-ramp volumes are not projected to change between the 2028 Baseline and 2028 Baseline plus Project scenarios. The main change between the two scenarios is the additional 4,700 employees associated with operation of the proposed Project. These employees would arrive and depart LAX across multiple different work shifts throughout the day, with a small percentage arriving in the AM and PM peak hours. Although the new terminal and concourse would result in some localized changes to the passenger trip patterns, the Project travel demand model estimated that there would not be any significant change to the northbound on-ramp volume during the AM and PM peak hours. In this location, the freeway mainline (in the morning peak hour) and Century Boulevard (both peak hours) is congested under the 2028 No Project (i.e., Projected Future Conditions Baseline) conditions and under 2028 Plus Project conditions, which can result in drivers avoiding the intersection and finding alternative routes.

With respect to traffic volumes estimated for the northbound off-ramp at I-405 and Century Boulevard, in response to comments these volumes have been investigated further; it was discovered that volumes for this intersection were incorrectly entered into the analysis software. Please see Response to Comment ATMP-AL010-255 for a discussion of this error, as well as a presentation of updated results using revised estimated volumes. The freeway queuing safety analysis has been corrected and revised results are presented in Response to Comment ATMP-AL010-255 and Chapter F3, Corrections and Clarifications to the Draft EIR. The revised queuing analysis presented in the corrections to the Draft EIR results in the same conclusion previously documented in the circulated Draft EIR. The results of the updated analysis do not change the conclusion of the Draft EIR; no significant impact.

ATMP-AL010-257

Comment: Validity of the Left-Turn Traffic Estimates

Review of the queue length calculation sheets in DEIR Appendix G (which are discussed in greater detail below) reveal that the Project is estimated to generate 26 left turns from the I-405 Northbound/Century Boulevard off-ramp in the AM peak hour and 15 such trips in the PM peak hour, as well as to cause questionable reductions in the number of off-ramp right turns.

To gain additional perspective with respect to the validity of the estimated left-turn volumes, we compared them to traffic generation information developed annually by LAWA. Each year, as a condition imposed by the City of Los Angeles, LAWA produces a report documenting the volume of traffic at LAX. The most recent version of that report

provides data describing the volume of traffic entering and exiting the CTA in the AM peak hour, the midday peak hour, and the PM peak hour. In the peak month (i.e., August) of 2019, an average of 5,202 vehicles entered the CTA in the AM peak hour, 5,614 entered in the midday peak hour, and 4,909 did so in the PM peak hour. (Reference: Los Angeles World Airports, Traffic Generation Report - Los Angeles International Airport / August 2019, November 2019, p. 1.)

The Project-related left-turn volumes described above represent 0.5 percent of the existing inbound AM trips at the CTA and 0.3 percent of the corresponding PM peak hour trips. In contrast, the existing AM peak hour left-turn volume at the off-ramp (1,177 vehicles) represents 22.6 percent of the entering CTA traffic and the 518 existing PM peak hour left turns equate to 10.6 percent of the entering CTA traffic. While we recognize that not all of the off-ramp left turns are bound for the CTA, we believe this provides a reasonable indication that the estimated ATMP Project volumes are not valid, as they appear to understate the volume of ATMP Project-generated traffic at the off-ramp.

Response: The commenter compares the existing northbound left turn volumes at the northbound I-405 and Century Boulevard off-ramp to the volume of existing vehicles entering the Central Terminal Area (CTA) and contends that the Draft EIR understates the volume of Project-generated traffic at the off-ramp. The commenter acknowledges that not all left turn traffic is destined for the CTA, and provides no factual information supporting its contention that freeway traffic estimates are understated. Moreover, it would be speculative to assume that any substantial portion of the left turn traffic at the northbound I-405 and Century Boulevard off-ramp is attributable to LAX given that the CTA ramps are approximately 1.5 miles from the off-ramp and this area provides access to multiple destinations including businesses, homes, and locations such as Santa Monica, Venice (via Sepulveda Boulevard and Lincoln Boulevard). Please refer to Response to Comment ATMP-AL010-251 regarding the Draft EIR's use of "Big Data" to calibrate the travel model used in the transportation analysis.

In addition, the transportation analysis in the Draft EIR does not understate the volume of the proposed Project-generated traffic at this location, as the majority of trips would be due to new employees of the proposed Project, who are estimated to arrive in multiple shifts throughout the day, with a substantial amount arriving before the typical morning and afternoon commute hours. The number of passenger trips between the 2028 Baseline and the 2028 Project does not change with the proposed Project, as the projected daily passenger levels remain constant between the two scenarios.

ATMP-AL010-258

Comment: Reasonableness of the Queue Length Estimates

All of the queue length values (including for existing conditions) were derived from traffic analysis software. There is no indication that the existing queues reported in the DEIR were validated in the field to ensure that the software-generated queue lengths accurately reflect the actual queues. Thus, we have no meaningful assurance that any of the queue length estimates presented in the DEIR reflect reality.

Response: The commenter states that there is no meaningful assurance the queue lengths presented in the Draft EIR reflect reality, but does not provide any evidence to show that they are incorrect. Section 4.8.5 of the Draft EIR assessed the queue lengths per the LADOT Transportation Analysis Guidelines which permits the use of traffic analysis software, including Synchro, to estimate vehicle queue lengths. For the Draft EIR, the queueing analysis was completed using Synchro 10's queue length calculation. Queuing analysis was conducted at one freeway off-ramp. This is a commonly accepted methodology/practice in the transportation planning/ engineering profession, and is the same approach used on many land use development projects both locally in Southern California and in other parts of California, as well as in many other states in the U.S. Both the City of Los Angeles and Caltrans endorse and accept the use of this software tool for transportation impact analysis and design purposes.

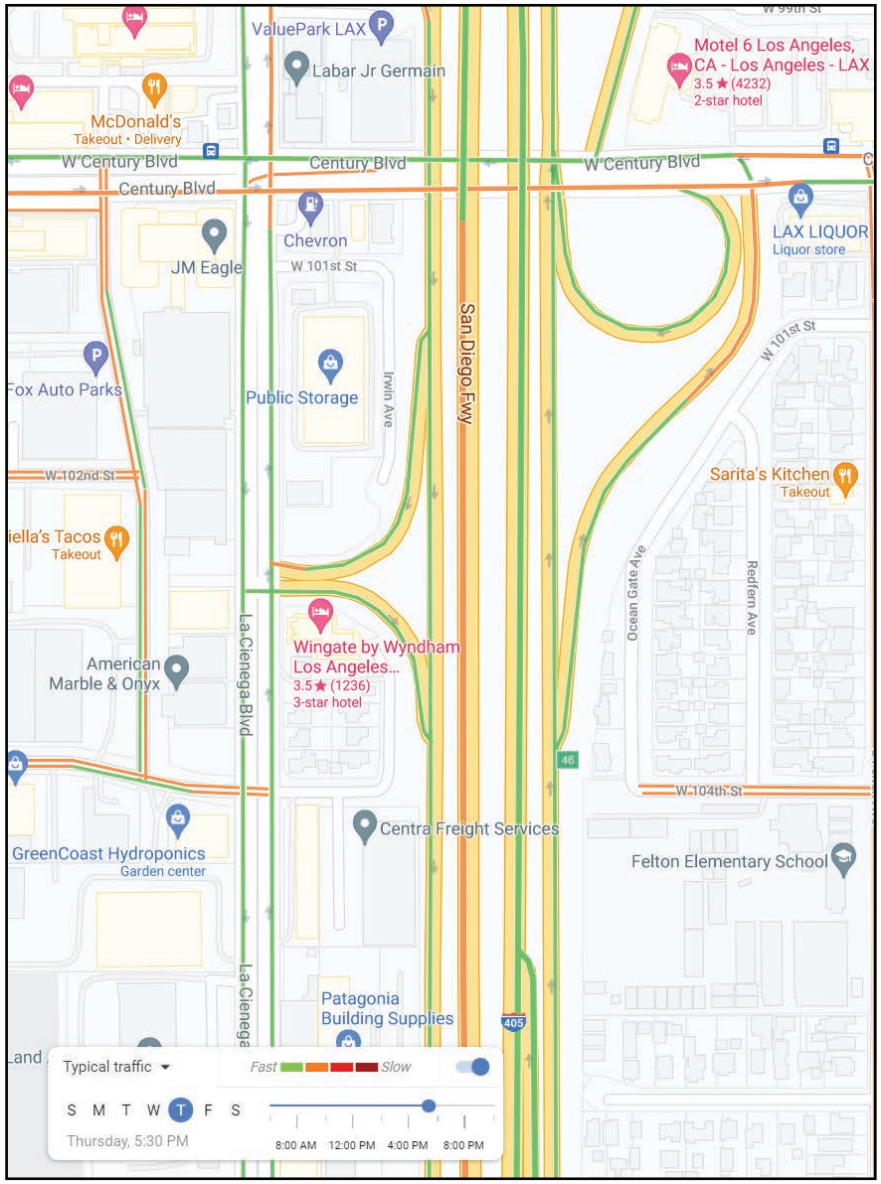
This response provides external data sources and analysis to rebut the assertion in the comment that the software-generated queue lengths may not accurately reflect the actual queues and that the implication that the Draft EIR analysis is deficient.

Additionally, the Google Maps website (https://www.google.com/maps) provides current and historic traffic information for the northbound I-405 and Century Boulevard off-ramp. Data[1] was reviewed for a typical weekday in both the morning and afternoon peak hours. The data showed that the travel speeds on the off-ramp were green (fast moving vehicles) in the AM peak hour and a combination of green and orange (fast and slower moving vehicles) in the PM peak hour. An example is provided in Figure 1 below. The Google Map speed data indicates that due to the vehicle speeds, there are no queues on the ramp that are likely to exceed the ramp storage space under typical operating conditions.

See Figure 1.

Finally, the traffic count data for this location was collected in 2019 under typical conditions prior to construction of Phase 1 of the LAX Landside Access Modernization Program. No field observations of queue length were conducted at that time. However, LAWA's transportation experts have used this methodology and approach to queue length analysis on numerous projects in California and conducted field observations to validate the results.

To provide additional evidence that the estimates are representative of typical conditions, mobile device data was obtained to determine typical weekday queue lengths. Wejo provides Global Position Satellite (GPS) data taken from connected vehicles[2] (https://www.wejo.com/). GPS data from the same time when the traffic counts were collected (during a single day in March 2019) was not available; however, weekday data from October 2019 is available from Wejo and considered appropriate for this analysis, albeit not the same as the data in Appendix G of the Draft EIR. The data was filtered to provide the location of each stopped vehicle on the northbound I-405 off-ramp to Century Boulevard and thus provided an estimate for vehicle queue length on the ramp. This estimate has a high level of confidence since it was derived from all the weekdays in October 2019 versus a single day traffic count or observation. Commenters concerned about analysis results matching observed conditions should also consider the sample size of input data. Using single day traffic counts, which is the common practice in Southern California, produces a high level of uncertainty regarding their representativeness for a full month or year.



Not to Scale

Sources: Google Maps, May 2021

Prepared by: Fehr & Peers, CDM Smith, June 2021

LAX Airfield and Terminal Modernization Project	Google Maps Traffic Speeds on NB I-405 & Century Boulevard Off Ramp (AM & PM Peak Hours)	Figure 1

The following documents the process used to determine the queue length from the October 2019 sample:

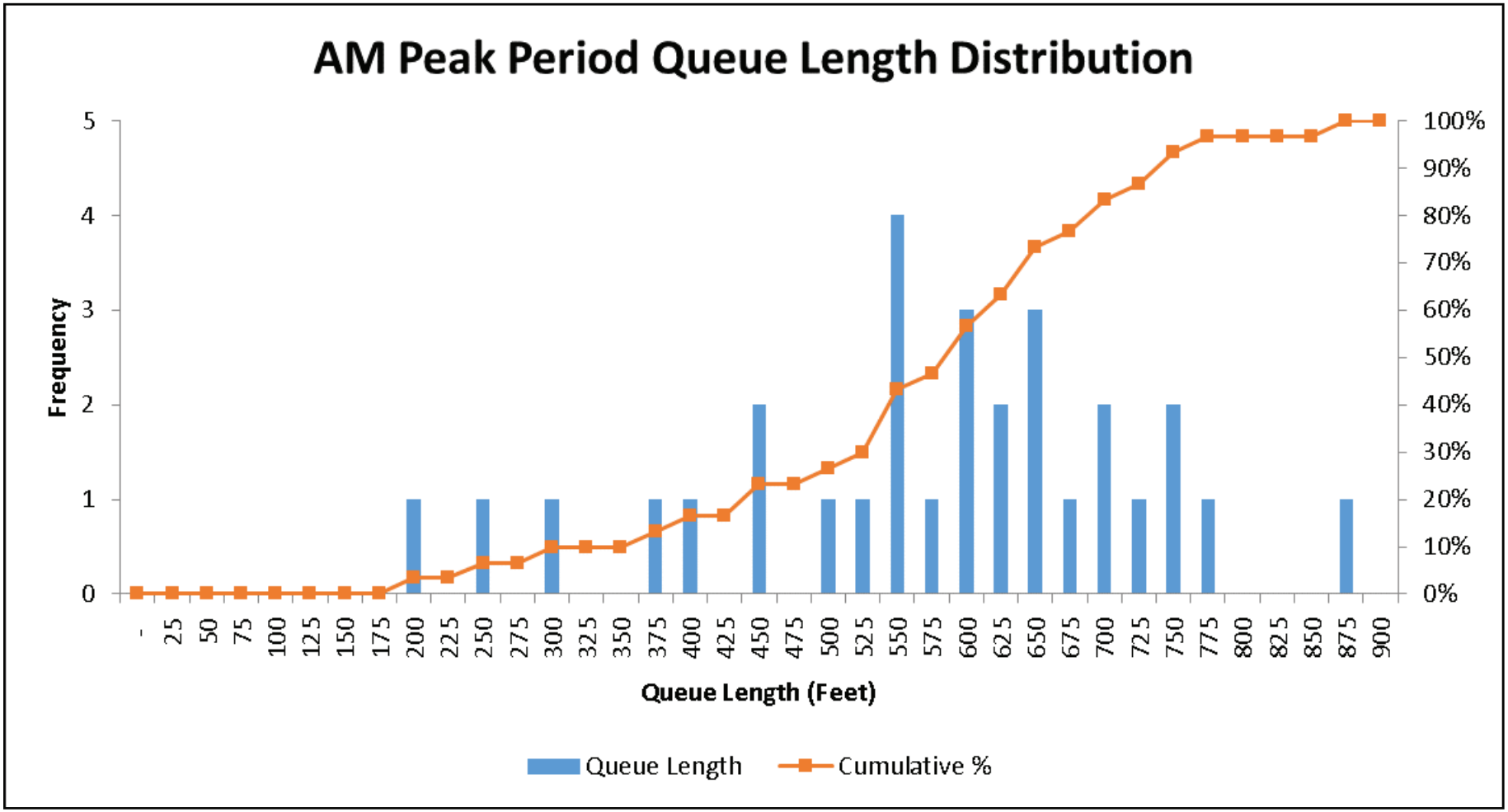
- Observed Wejo data samples were obtained for typical weekdays in October 2019.
- The data was collected during the morning and afternoon peak commute periods.
- Outlier data points based were removed from the data so that the data was representative of typical driving conditions.
- For each minute in the peak hour, the back of the queue was estimated as the distance from Century Boulevard to the location of the stopped off-ramp vehicle that was farthest away.
- For the AM and PM peak periods, the 95th percentile queue length was determined from the one-minute queue lengths. Please refer to Figures 2 and 3 below, which show the one-minute queue estimates for a single day.
- The 95th percentile queues was averaged across the representative days.
- The 95th percentile queue length for AM and PM peak periods were estimated at 775 feet and 220 feet respectively.

The Draft EIR (using the Synchro software) estimated the 95th percentile queue length for the AM peak period in March 2019 at 325 feet, which is shorter than estimate from Wejo data (775 feet) in October 2019. The estimate for the 95th percentile queue length in the PM peak period was 275 feet, slightly longer than the 220 feet estimate from Wejo data. These differences do not mean that the Synchro results underestimated the queue for the March 2019 analysis day. As shown in the AM Peak Period Queue length distribution below, queue lengths as short as 200 feet were observed in October 2019 under AM peak period conditions and 100 feet under PM peak period conditions.

If the new data from Wejo was used in place of the information in Appendix G of the Draft EIR, the year 2019 95th percentile queue length for AM peak period would be 775 feet. Adding the proposed Project's 100 feet queue increase would extend the expected 95th percentile queue length to 875 feet. During the afternoon PM peak period, the 95th percentile queue length would increase from 325 feet under 2019 conditions to 425 feet under Proposed Project conditions, a 100-foot increase. Therefore, this would not change the conclusions reached in the Draft EIR as the queue lengths are less than the 1,200-foot ramp capacity. The result of the freeway safety impact analysis in the Draft EIR remains less than significant.

See Figures 2 and 3.

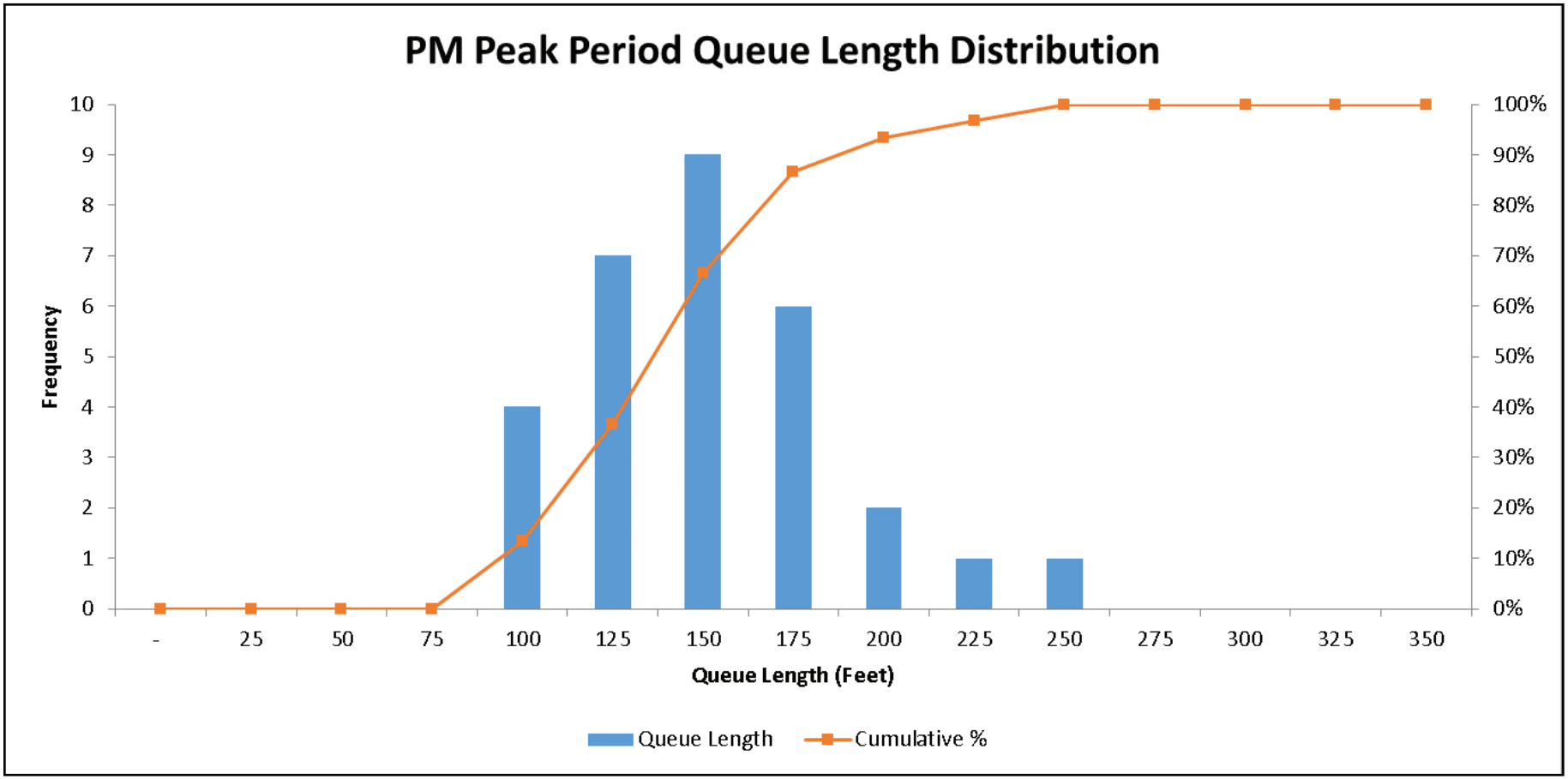
[1] Data was taken from www.google.com/maps on May 27, 2021 using the "Typical Traffic" function on the webpage that displays vehicle speeds for specific times of the day.
[2] A connected vehicle (CV) is a vehicle that can communicate bidirectionally with other systems outside of the vehicle. This allows the vehicle to share internet access, and hence data, with other devices both inside and outside the vehicle. Wejo aggregates and anonymizes passenger CV data to provide the location during a trip (movement data) and when specific notifications occur (event data) such as turning on/off the engine, hard breaking, quickly accelerating, or going above a certain speed.



Sources: Wejo data, October 2019

Prepared by: Fehr & Peers, CDM Smith, June 2021

LAX Airfield and Terminal Modernization Project	AM Peak Period Queue Length Distribution	Figure **2**



Sources: Wejo data, October 2019

Prepared by: Fehr & Peers, CDM Smith, June 2021

LAX Airfield and Terminal Modernization Project	PM Peak Period Queue Length Distribution	Figure 3

ATMP-AL010-259

Comment: Century Boulevard Operational Deficiencies

While not discussed in the DEIR, the queue length analysis worksheets reveal substantial operational deficiencies on Century Boulevard. In particular, the queue on the westbound Century Boulevard thru movement at the I-405 Northbound Off-ramp/Century Boulevard intersection is projected to be 662 feet (27 vehicles) long in the AM peak hour under 2028 Baseline Plus Project conditions. In the PM peak hour, that queue would be 309 feet (13 vehicles) long. However, only approximately 200 feet exist between the subject intersection and the next intersection to the east (Century Boulevard/Felton Avenue). Thus, in both peak-hour periods, the Felton Avenue intersection would be blocked by westbound vehicles on Century Boulevard, as would several driveways serving private properties.

More importantly, perhaps, given the freeway-related intent of the analysis, the eastbound thru queue in the PM peak hour at this intersection would be 652 feet (27 vehicles) long, which would be sufficient to block access to the I-405 northbound on-ramp. (Perhaps this is the reason for the illogical lack of growth in the I-405 on-ramp traffic, as described above.)

Response: The commenter refers to operational deficiencies on Century Boulevard related to vehicle queue length. As discussed in Section 4.8.2.4.2 of the Draft EIR, the freeway ramp queuing analysis was conducted accordance with the Los Angeles Department of Transportation's (LADOT) Interim Guidance for Freeway Safety Analysis,[1] including assessing queue spillback at the I -405 northbound and Century Boulevard off-ramp. This analysis was completed to determine whether the proposed Project would substantially increase hazards by resulting in queues that extend onto the freeway mainline. Per the results of the analysis, no significant freeway safety impacts were identified (see page 4.8-60 of the Draft EIR) supporting the conclusion that the proposed Project would result in a less than significant impact regarding transportation hazards. The queuing that occurs at this location, on all legs of the intersection, was taken into consideration in the results of the freeway safety analysis. Any traffic operations deficiencies that occur on Century Boulevard are not subject to CEQA review and guidelines for determining impacts of a Project. Please refer to topical response TR-ATMP-T-1 regarding CEQA analysis requirements.

[1] City of Los Angeles, Department of Transportation, LADOT Transportation Assessments – Interim Guidance for Freeway Safety Analysis, May 1, 2020. Available: https://ladot.lacity.org/sites/default/files/2020-06/ladot-tag-interim-freeway-safety-analysis-guidancemay-2020-2.pdf.

ATMP-AL010-260

Comment: Flawed Interpretation of Analysis Results

We also note that the more-than-600-foot queue length estimates are shown on the analysis worksheet with a "#" symbol, which refers to a footnote stating, "95th percentile volume exceeds capacity, queue may be longer." Thus, the situation might well be worse than described here, with even greater traffic obstructions prevailing.

Response: The commenter is referring to the queuing analysis worksheet that identifies the westbound through movement exceeding the available storage space at the intersection. The 95th percentile queue calculated by the Synchro software is based on the operation of the intersection for two cycles in a row. These volumes exceed the capacity of the intersection. Therefore, if the 95th percentile volume continues to occur for additional cycles, the queue would be longer. When this occurs, the Synchro software provides a standard warning message. However, it is not likely that the volumes would be at the 95th percentile level for several cycles in a row. The analysis acknowledges that the queues may be longer for the westbound through movement, but this does not invalidate the results of the freeway off-ramp analysis for the proposed Project. This analysis was completed to determine whether the proposed Project would substantially increase hazards by resulting in queues that extend onto the freeway mainline. The fact that the queuing analysis worksheets included in Appendix G.9 show queues on local surface streets is acknowledged but their inclusion in the Draft EIR is to provide technical support for the analysis described in Section 4.8.5.5.

It should also be noted that the queueing analysis and turning movement volumes have been revised as part of the Response to Comment ATMP-AL010-255. In summary, the updated analysis changes the queue length results for the northbound I-405 off-ramp leg of the intersection. These results are reported in Response to Comment ATMP-AL010-255. The text of the Draft EIR has been revised to reflect these results; please refer to Chapter F3, Corrections and Clarifications to the Draft EIR. The updated analysis does not result in any changes to the impact conclusion which remains less than significant.

ATMP-AL010-261

Comment: Obsolete Analysis Software

And, finally, we note that the queue length analysis was conducted using procedures documented in the year 2000 edition of the Highway Capacity Manual (HCM). The HCM, which is published by the Transportation Research Board (TRB) of the National Academies of Science, Engineering, and Medicine, is the primary resource with respect to matters associated with road capacity and intersection operations. Two editions of that document have been published since the 2000 version, one in 2010 and one in 2016. It is unclear why the analysts chose to use this outmoded version of the document to complete this analysis.

Response: The LADOT Transportation Assessments - Interim Guidance for Freeway Safety Analysis[1] states that "land use development projects within the City of Los Angeles that are required to prepare a transportation assessment shall conduct a freeway safety analysis as follows…[u]sing Synchro analysis software, or similar tools, prepare a queuing study for the "Future with Project" conditions for the proposed project build-out year."

The commenter incorrectly states that the queueing analysis in the Draft EIR was conducted using the HCM 2000 methodology. For the Draft EIR, the queueing analysis was completed using Synchro 10's queue length calculation, which is a more robust queue analysis than HCM's queue calculation due to its consideration of vehicle flow from the upstream intersection. The utilization of Synchro 10's queue length calculation is standard practice when analyzing queues in Synchro. This calculation is independent of the version of the HCM methodology that is used. The level of service analysis worksheet included in the Draft EIR is additional information but was not used in the queuing analysis of the proposed Project.

[1] City of Los Angeles, Department of Transportation, LADOT Transportation Assessments – Interim
Guidance for Freeway Safety Analysis, May 1, 2020. Available:
https://ladot.lacity.org/sites/default/files/2020-06/ladot-tag-interim-freeway-safety-analysis-guidancemay-2020-2.pdf.

ATMP-AL010-262

Comment: Summary

The "freeway safety analysis" presented in the DEIR is highly flawed, to the point where the results are simply not credible. The analysis must be corrected, and the modified analysis must be incorporated into a revised DEIR and circulated for further public review.

Response: The content of this comment is substantively the same as comment ATMP-AL010-125; please refer to Response to Comment ATMP-AL010-125. As discussed in that response the freeway safety analysis was completed in accordance with the City of Los Angeles Transportation Assessment Guidelines. Corrections were made to the freeway queuing safety analysis, which are presented in Chapter F3, Corrections and Clarifications to the Draft EIR. In preparing the Final EIR for the proposed Project, LAWA has reviewed all of the comments received, including comment ATMP-AL010-125, and has carefully considered the responses to these comments and other information provided in the LAX Airfield and Terminal Modernization Project Final EIR. None of the information provided in the Final EIR meets the criteria for recirculation of an EIR as outlined in Section 15088.5 of the State CEQA Guidelines.

ATMP-AL010-263

Comment: 9. Cumulative Impacts – The DEIR purports to provide an analysis of cumulative conditions, but this is questionable. The traffic analysis addresses the following analysis scenarios:

• Existing (2019),

• Future Baseline (2028), and

• Future Baseline (2028) With Project.

No Existing + Project scenario was considered, as the DEIR says that would be "misleading," since the project will not be operational until 2028. Similarly, no analysis is presented for any scenario addressing a time frame beyond the anticipated 2028 Project implementation.

In justifying this approach, the DEIR states that the analysis, as presented, reflects completion of the ground transportation system improvements associated with the LAX Landside Access Modernization Program (LAMP) Phase 1 as well as the Airport Metro Connector 96th Street Transit Station (p. 4.8-61):

As such, the baseline used for the transportation analysis already accounts for other transportation improvement projects, and the identification of impacts associated with the currently proposed Project provides the basis to measure and evaluate cumulative impacts and assess whether the proposed Project has a cumulatively considerable contribution to the combined impacts.

However, no support is presented that would provide reasonable assurance that the LAMP Phase 1 improvements will actually be complete by 2028. Unless such support can be provided, it is inappropriate to rely on a future baseline for the transportation analysis.

Response: As stated in Section 4.8.1.1 of the Draft EIR, Section 15125(a)(1) of the State CEQA Guidelines provides that "a lead agency may define existing conditions by referencing…conditions expected when the project becomes operational" and Section 15125(a)(2) provides that a lead agency "may use projected future conditions…" As noted in the Analytical Framework discussion at the beginning of Chapter 4, the surface transportation characteristics around LAX will be substantially changed by the improvements associated with Phase 1 of the LAX Landside Access Modernization Program. Those improvements include the LAX Automated People Mover (APM), the Intermodal Transportation Facility East and ITF West, the consolidated rental car facility (CONRAC), and Phase 1 roadways, all of which will be completed and operational prior to completion of the proposed Project in 2028. In addition, Metro's Airport Metro Connector (AMC) 96th Street Transit Station will also be completed by 2028. The changes to the existing (2019) surface transportation characteristics around LAX resulting from these improvements will, in turn, change the existing VMT characteristics of LAX. The use of the Future Conditions Baseline (2028) provides the only truly representative and accurate disclosure of Project-related VMT impacts. Using an Existing

(2019) Conditions Baseline would be misleading as it would confound the ability to distinguish VMT changes in 2028 that are due to the proposed Project versus the VMT changes in 2028 that are due to Phase 1 of the LAX Landside Access Modernization Program. Therefore, 2028 is appropriately used as the baseline for the transportation impact analysis. In addition to the scenarios listed by the commenter and analyzed in the Draft EIR, Section 4.8.6 describes the cumulative transportation impacts of the proposed Project.

Regarding the commenter's questioning whether the LAX Landside Access Modernization Program Phase 1 improvements would be completed by 2028, please refer to Response to Comment ATMP-AL010-98.

ATMP-AL010-264

Comment: Moreover, the land use assumptions incorporated into the 2028 traffic estimates are unclear. The DEIR specifically refers to 123 cumulative projects (p. 4.8-35; Appendix G-7), but there is no discussion of those projects in the Cumulative Impacts section (beginning at DEIR p. 4.8-61). The volume of traffic associated with the 123 cumulative projects is presented at DEIR Appendix G.7. According to that table, those projects would generate almost 233,000 daily trips, almost 20,000 AM peak hour trips, and over 25,000 PM peak hour trips. Because the DEIR does not adequately describe the cumulative land use projects (i.e., how many of these cumulative land use projects will be implemented by 2028), it is not possible to verify the accuracy of the cumulative traffic estimates.

Response: As described in Section 4.8.2.2 of the Draft EIR, to estimate the future growth and change in traffic for 2028 conditions, a future year 2028 Project Travel Demand Model was developed based on the 2016 and 2040 City of Los Angeles Travel Demand Forecasting Model. The land use data within five miles of the Project site were reviewed for growth related to specific future developments. As noted by the commenter, these specific future developments are included in Appendix G.7, Cumulative Projects. The list of cumulative projects was prepared based on data provided by LADOT, the City of Los Angeles Department of City Planning, the City of Culver City, the City of El Segundo, the City of Gardena, the City of Hawthorne, the City of Inglewood, Los Angeles County, as well as approved traffic studies in the vicinity of the Project site, websites, and field observations. A total of 123 cumulative projects were identified and the growth associated with these projects was cross-checked with travel model data. Because the travel demand model already reflects growth in the area, adjustments to the land uses were made to account for the cumulative projects not already reflected in the 2028 model. All the land use growth contained in the cumulative project list was assumed to occur by 2028. Given that Section 4.8.3.3.1 describes the 2028 land use assumptions, and that Appendix G.7 contains a full list of cumulative projects reflected in the 2028 travel demand model, the Draft EIR clearly explains the land use growth anticipated in the area and no further explanation is needed.

ATMP-AL010-265

Comment: Furthermore, as noted above, no discussion is presented with regard to conditions beyond the 2028 implementation year. As described at DEIR p. 2-17, passenger demand at LAX is projected to increase to 110.8 million annual passengers (MAP) in fiscal year (FY) 2028 compared to 86.1 MAP in FY 2018, almost a 30 percent increase. Passenger activity in the year 2045 is projected to be 127.0 MAP, which represents roughly a 50 percent increase over existing conditions and a 15 percent increase over the 2028 Baseline. We would also note that these projections ignore the likely increases in activity at LAX that are directly attributable to the ATMP Project, as discussed earlier. The DEIR has completely failed to address the cumulative effects of these major increases in activity at LAX.

Response: Please see Topical Response TR-ATMP-G-3 regarding the bases for why 2028 is the appropriate horizon year for evaluating the impacts of the proposed Project.

ATMP-AL010-266

Comment: 10. Emergency Access – The ATMP Project's potential emergency access impacts were not addressed in the DEIR, as the Initial Study found that the ATMP Project would have a "Less Than Significant" impact. (DEIR, p. 4.8-2) The analysis of this issue, however, was restricted to the area in the immediate vicinity of the ATMP Project. It ignored anything beyond the boundaries of LAX.

Moreover, it focused almost exclusively on the construction period. As such, it failed to address the question of whether the traffic generated by the ATMP Project would result in congestion that would substantially impede the ability of emergency vehicles to respond to calls at or near LAX or to reach hospitals, either during the construction period or throughout the life of the ATMP Project.

Response: The commenter accurately notes that potential emergency access impacts were addressed in the Initial Study which concluded that the proposed Project would result in a "less than significant impact" to emergency access and no further analysis of this topic was required in an EIR. As discussed therein, LAWA's Design and Construction Handbook specifies that a Logistic Plan and fully documented Logistical Work Plan Checklist be developed for construction projects, including identification of emergency access provisions, emergency evacuation routes, and 24-hour emergency contact information. Further, LAWA would coordinate with the Los Angeles Fire Department and LAWA Police Division regarding emergency access and other design needs to ensure that emergency service levels are maintained during construction. Any work and work zone setups would comply with all applicable permitting requirements including, but not limited to, California Department of Transportation (Caltrans), City of Los Angeles Public Works and Department of Transportation, and the requirements set forth in the California Manual of Uniform Traffic Control Devices (MUTCD). LAWA has significant experience consulting with the Los Angeles Fire Department and LAWA Police Division concerning emergency access during construction of significant projects. That experience has shown that, through such consultations, emergency access can be maintained during construction.

Therefore, the proposed Project would not result in inadequate emergency access, and impacts to emergency access would be less than significant.

Regarding emergency access once the proposed Project is in operation, as discussed in the Initial Study, the proposed Project would not restrict emergency access, increase response times, extend station response distances, or decrease fire flow beyond the standards maintained by the agencies serving LAX and the surrounding communities. It would also not require the need for a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain adequate service levels. Further, the proposed Project includes landside (roadway) improvements, which are designed to improve overall access to and from the CTA, and provide access to the new Terminal 9, with a combination of segments that are elevated or at-grade with connecting ramps. Also, initial consultation with the Los Angeles Fire Department and the LAWA Police Division has occurred for the proposed Project regarding safety and security, including emergency access, and would continue as the design of the Project progresses in conjunction with more detailed planning and design.

Therefore, operation of the proposed Project would have a less than significant impact on fire protection and emergency services and no further analysis in the EIR is required.

ATMP-AL010-267

Comment: 11. Parking Analysis – Although the ATMP Project proposes construction of a parking structure at Terminal 9, no analysis is provided to determine whether the unknown number of additional parking spaces will be adequate to serve the newly-generated demand. As noted earlier, the number of parking spaces to be provided in the Terminal 9 structure is not stated in the DEIR.

Response: The comment is similar to comment ATMP-AL010-14; please refer to Response to Comment ATMP-AL010-14.

ATMP-AL010-268

Comment: The ATMP Project would also involve the acquisition of a number of properties, including existing parking facilities. No indication is provided, however, as to how many parking spaces exist on the properties to be acquired and how many, if any, will continue to be available to serve the parking demand generated by the ATMP Project. The DEIR should identify the net increase or decrease in the available parking supply following completion of the ATMP Project. Further, it must address how this compares to the parking demand generated by the ATMP Project and LAX as a whole.

Response: The content of this comment is similar to comment ATMP-AL010-14; please refer to Response to Comment ATMP-AL010-14.

ATMP-AL010-269

Comment: 12. Analysis of Project Alternatives – DEIR Chapter 5 presents the analysis of the ATMP Project alternatives. Four alternatives are addressed:

• Alternative 1: No Project,

• Alternative 2: Concourse 0 Only,

• Alternative 3: Terminal 9 Only, and

• Alternative 4: Approved LAMP Roadway Improvements plus Terminal 9 Access Alterative.

The VMT impacts associated with each alternative are addressed, although not in a consistent fashion. Specifically, for Alternatives 1, 3, and 4, the VMT impacts were evaluated based on running modified versions of the LAX Travel Demand Model, from which detailed VMT estimates were derived. In each case, this approach is identified as being "consistent with the methodology described in Section 4.8.2 for the proposed Project VMT analysis." (DEIR, pp. 5-47, 5-77, and 5-92)

Inexplicably, however:

An additional model run for Alternative 2 was not undertaken due to the similarity of this alternative (with the exception of Terminal 9, and the Terminal 9 APM station and parking facility) to the proposed Project." (DEIR, p. 5-63)

It is simply not credible to claim that the VMT impacts of Alternative 2 would be similar to those associated with the proposed ATMP Project. The "exceptions" described above are not inconsequential; in fact, they are major components of the ATMP Project. Terminal 9 would provide 12 – 18 new passenger gates within a 1,178,000-square-foot structure (DEIR, pp. 2-27 – 2-28). Approximately 3,225 employees (almost 70 percent of the ATMP Project total) would be required to operate Terminal 9, including 1,290 employees "for a typical 8- to 9-hour shift." (DEIR, p. 4.8-11) In addition, the "exceptions" include the 700,000-square-foot Terminal 9 parking facility (DEIR, p. 2-28) and its unspecified number of new parking spaces, as well as the extensive system of roadways intended to serve Terminal 9 and its parking structure.

Given the massive reduction in project size associated with this alternative, it is completely inappropriate to fail to perform a quantitative analysis of its VMT impacts and, instead, to rely on a subjective, speculative determination as to those impacts. In short, no factual basis or support is provided with respect to the VMT impacts associated with Alternative 2.

Response: Regarding the analysis of transportation impacts associated with Alternative 2 in Chapter 5 of the Draft EIR, an additional model run was not undertaken as noted by the commenter. As explained in Section 5.5.2.8.2, while Alternative 2 would no longer include Terminal 9 or the Terminal 9 Automated people mover (APM) station and parking facility, in comparison to the proposed Project the VMT impacts are expected to

be similar for Employee VMT, Passenger VMT, and Induced VMT. It is anticipated that the employee VMT rate (i.e., VMT per employee) would be similar to the proposed Project because the location of employee parking destinations would be the same in both Alternative 2 and the proposed Project. Since Alternative 2 would have fewer new employees, the overall amount of VMT generated by employees under Alternative 2 would be less than the proposed Project; however, the VMT per employee rate would be the same. Therefore, VMT per employee would be a significant impact under Alternative 2.

As described in Section 5.5 of the Draft EIR, the estimated number of passengers traveling via the airport is similar under all proposed alternatives. For passenger VMT, the total passenger VMT under Alternative 2 is expected to be slightly more than the proposed Project, as passengers accessing Terminal 9 directly from northbound Sepulveda Boulevard or Jetway Boulevard would be required to access the CTA using the new proposed Project roadways. Therefore, Alternative 2 would result in a significant impact related to passenger VMT.

For induced VMT, the proposed ramps to the CTA under Alternative 2 are essentially the same as those of the proposed Project; therefore, the short-term and long-term induced VMT impacts of Alternative 2 would also be consistent with the significant impact reported for the proposed Project. Conducting an additional model run of Alternative 2 as requested by the commenter would not change the VMT impact conclusions reported in the Draft EIR.

ATMP-AL010-270

Comment: 13. Various Unsupported Statements – The DEIR presents as fact a number of statements that are unsupported by the transportation analysis. Examples include:

• The types of improvements anticipated as part of the roadway system concept for the proposed Project would . . . provide the following additional benefits for traffic related to the CTA: . . . improvement of through-traffic flow for surrounding communities (i.e., vehicles on Sepulveda Boulevard that are not accessing the airport) by reducing traffic congestion on Sepulveda Boulevard. (DEIR, p. 2-39)

• The proposed roadway system would improve overall access to and from the CTA . . . (DEIR, p.2-39)

• The proposed access improvements would help keep airport-related traffic congestion and back-up off public streets. (DEIR, p. 2-10)

These statements can only be supported through the completion of quantitative level of service analyses, as described above.

Response: The commenter points to several statements in the Project Description chapter of the Draft EIR relating to landside improvements, claims that the statements are unsupported, and that the only way to support the description of the landside

improvements is with a level of service analysis. As discussed in Sections 2.3.1.1.3 and 2.4.3 of the Draft EIR, the basic design of the proposed landside improvements include: (1) eliminating the Sky Way entrance to the CTA and replacing it with a new flyover ramp that adds approximately 5.8 additional lane miles of vehicle storage/queueing space for CTA traffic on an airport road that is separate from Sepulveda Boulevard; and (2) moving the CTA entrance from northbound Sepulveda Boulevard away from the Sepulveda Tunnel and placing it farther north to connect with the new CTA entrance roadway system that includes the approximately 5.8 additional lane miles of vehicle storage/queueing space for CTA traffic. The landside improvements are designed to fulfill the Project objectives and do not require a quantitative level of service analysis to determine their effectiveness.

Please also see Topical Response TR-ATMP-T-1 regarding the assessment of transportation effects associated with the LAX Airfield and Terminal Modernization Project that are not subject to CEQA, which was conducted in accordance with the City of Los Angeles Transportation Assessment Guidelines. As indicated therein, traffic congestion is no longer used as a basis for determining significant transportation impacts under CEQA.

ATMP-AL010-271

Comment: The DEIR must be revised to incorporate such analyses and the revised document must then be recirculated for further public review.

Response: Please see Response to Comment ATMP-AL010-270 regarding the adequacy of the Draft EIR's transportation analysis. In preparing the Final EIR for the proposed Project, LAWA has reviewed all of the comments received, including comment ATMP-AL010-270, and has carefully considered the responses to these comments and other information provided in the LAX Airfield and Terminal Modernization Project Final EIR. None of the information provided in the Final EIR meets the criteria for recirculation of an EIR as outlined in Section 15088.5 of the State CEQA Guidelines.

ATMP-AL010-272

Comment: CONCLUSION

Our review of the Draft Environmental Impact Report completed in connection with the proposed Airfield and Terminal Modernization Project at Los Angeles International Airport (LAX) in Los Angeles, California revealed a number of issues regarding the adequacy of the transportation analysis. The deficiencies we have identified raise significant questions as to the validity of the conclusions presented in the DEIR with respect to ATMP Project-related impacts.

Response: Please see Responses to Comments ATMP-AL010-225 through ATMP-AL010-271 above and ATMP-AL010-273 through ATMP-AL010-277 below.

ATMP-AL010-273

Comment: Of particular concern is the apparent failure of the environmental analysis to accurately assess the impacts of the ATMP Project with respect to vehicle-miles-traveled. Our analysis indicated that, when the detailed layout of the Central Terminal Area road system is carefully evaluated, the Project-related passenger VMT will be substantially greater than is indicated in the DEIR.

Response: The commenter states that its analysis indicates the Project-related passenger VMT will be substantially greater than is indicated in the Draft EIR. This comment may be based on comments provided by the commenter in comment ATMP-AL010-227. Please refer to Response to Comment ATMP-AL010-227. No further information is provided regarding the reasons why the commenter believes that the estimate of passenger VMT is incorrect. For this reason, it is not possible to respond further to the commenter's statement.

ATMP-AL010-274

Comment: We also believe that the DEIR is deficient due to its failure to include any analysis of Project-related construction impacts. In that regard, we have proposed several measures intended to give the neighboring City of El Segundo a voice in establishing construction haul routes and generally guiding and monitoring construction activities.

Response: The content of this comment is similar to comment ATMP-AL010-135; please refer to Response to Comment ATMP-AL010-135, as well as Response to Comment ATMP-AL010-133.

ATMP-AL010-275

Comment: We further believe that it is incumbent upon LAWA to perform roadway operations analyses at a sufficient level of detail as to reveal impacts of the Project on traffic operations in nearby jurisdictions, particularly in El Segundo.

Response: Please see Topical Response TR-ATMP-T-1 regarding the assessment of transportation effects associated with the LAX Airfield and Terminal Modernization Project that are not subject to CEQA, which was conducted in accordance with the City of Los Angeles Transportation Assessment Guidelines. As indicated therein, level of service (i.e., operations analyses) is no longer used as a basis for determining significant transportation impacts under CEQA in California. Please also see Response to Comment ATMP-AL010-249, which sets forth claims similar to those in this comment.

ATMP-AL010-276

Comment: And the freeway safety analysis presented in the DEIR must be revised to correct the obvious problems with the traffic volumes employed in the calculations.

Response: Please see Responses to Comments ATMP-AL010-253 to ATMP-AL010-256 regarding the freeway safety analysis conducted for the proposed Project. The freeway queuing safety analysis has been corrected and revised results are presented in Response to Comment ATMP-AL010-255 and Chapter F3, Corrections and Clarifications to the Draft EIR. The revised queuing analysis presented in the corrections to the Draft EIR results in the same conclusion previously documented in the circulated Draft EIR.

ATMP-AL010-277

Comment: These issues must be addressed prior to approval of the proposed project and its environmental documentation.

Response: Please see Responses to Comments ATMP-AL010-225 through ATMP-AL010-276, which address comments contained in the letter prepared by Griffin Cove Transportation Consulting, PLLC, which was included as Attachment C of the City of El Segundo's comments on the LAX Airfield and Terminal Modernization Project Draft EIR.

ATMP-AL010-278

Comment: Per your request, Tamura Environmental, Inc. has reviewed the air quality and greenhouse gas sections of the Draft EIR (DEIR) for the Los Angeles International Airport (LAX) Airfield & Terminal Modernization Project (ATMP).[1] Our review revealed a number of issues with the DEIR, with one of the most significant being that it does not evaluate the year when the project actually impacts LAX's capacity. By only evaluating the year that construction is complete, it underestimates operational emissions of criteria air pollutants, toxic air contaminants and greenhouse gases (GHG) associated with the project.

[1] Los Angeles World Airports (LAWA), Draft Environmental Impact Report (Draft EIR) - Airfield & Terminal Modernization Project, Los Angeles International Airport, State Clearinghouse No. 2019049020, October 2020.

Response: This comment is in a letter from Tamura Environmental to Shute, Mihaly & Weinberger LLP, representing the City of El Segundo that was attached to, and considered part of, the City's comments on the Draft EIR. Note that the reference to "your request" is a reference to a request made by Shute, Mihaly & Weinberger LLP to Tamura Environmental, not a request from LAWA. With regard to the issue raised in this comment, please see Topical Response TR-ATMP-G-3 regarding the reasons why 2028 is the appropriate horizon year for evaluating the impacts of the proposed Project. For the reasons explained therein, the Draft EIR's analyses of criteria air pollutants, toxic air

contaminants, and greenhouse gases (GHG) associated with the proposed Project are accurate and appropriate.

ATMP-AL010-279

Comment: These issues, which are presented below, must be addressed prior to the certification of the environmental document and approval of the ATMP.

Response: Responses to the specific comments raised in this letter are provided in Responses to Comments ATMP-AL010-280 through ATMP-AL010-309.

ATMP-AL010-280

Comment: Project Context/Existing Conditions

Operational emissions from the airport (identified in Appendix C.2 of the ATMP DEIR) are summarized in Tables 1 and 2 on the following page; the majority of the VOC, NOx, and SOx emissions are from the aircraft. To provide some context for the airport's NOx emissions relative to recent emissions inventory calculations by the South Coast Air Quality Management District (SCAQMD):[2]

• The daily NOx emissions from LAX are approximately 4% of the daily emissions for the entire South Coast Air Basin (SCAB) in 2018, and are projected to be approximately 7% of the Basin's total in 2028.
• The 2018 annual NOx emissions from LAX are over half of the emissions of all "point sources" (permitted industrial sources) in the entire SCAB, and are more than double the combined NOx emissions of all the petroleum refineries in the Wilmington/Carson/West Long Beach area.
• The magnitude of the increase in LAX operational NOx emissions between 2018 and 2028 (1.25 tons per day) is roughly 40-50% of the magnitude of the total SCAB-wide NOx reductions identified in SCAQMD's 2016 Clean Air Plan for "Traditional Regulatory Measures" in 2022 and 2023 (2.6 and 3.2 tons-per-day, respectively).[3]

These are comparisons to region-wide air emissions; clearly, the airport has a greater relative contribution locally. The DEIR acknowledges that "[t]he existing air quality setting in the immediate vicinity of the Project site is dominated by air pollutants from aircraft activities, including landings and take-offs, taxiing, and other aircraft movements; vehicles on airport roads and surrounding roads and highways; and industrial uses." (p. 3-2)

Table 1. Annual Emissions from LAX.

	CO (tons/yr)	VOC (tons/yr)	NO_x (tons/yr)	SO_x (tons/yr)	PM_{10} (tons/yr)	$PM_{2.5}$ (tons/yr)	GHG (metric tonnes CO_2e/yr)
2018	9,823	945	5,448	411	503	193	2,151,823
2028 (No Project)	9,077	854	5,892	499	611	223	2,335,427
2028 (With Project)	9,133	871	5,891	498	620	225	2,356,700
10-Year Change[a]	-690	-74	+443	+87	+117	+32	+204,877

[a]Values shown are the difference between the 2028 (With Project) case and 2018; the difference between 2028 (No Project) and 2018 is not qualitatively different.

Table 2. Daily Emissions of Criteria Pollutants from LAX.

	CO (lbs/day)	VOC (lbs/day)	NO_x (lbs/day)	SO_x (lbs/day)	PM_{10} (lbs/day)	$PM_{2.5}$ (lbs/day)
2018 Operations	55,339	5,323	30,690	2,314	2,834	1,090
Construction – Max. Year	4,394	385	805	173	33	20
2028 Operations (No Project)	51,140	4,813	33,193	2,812	3,440	1,256
2028 Operations (With Project)	51,456	4,906	33,199	2,808	3,492	1,268
10-Year Change in Operations[a]	-3,883	-417	+2,509	+495	+658	+178

[a] Values shown are the difference between the 2028 (With Project) case and 2018; the difference between 2028 (No Project) and 2018 is not qualitatively different.

LAX handled 88 million annual passengers (MAP) in 2019, making it the third-busiest airport in the world.[4] It is also projected to grow: i.e., the recently released South Coast Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy, "Connect SoCal", projects 127 MAP at LAX in 204[5].5 While the Program EIR for Connect SoCal concludes that total emissions for the South Coast Air Basin (SCAB) "are expected to generally decline through at least 2031 except for small increases in PM2.5 and SOx",[6] the ATMP DEIR projects increasing NOx (an ozone precursor) and other air pollutants from LAX.

[2] SCAQMD, "Emissions Inventory in the Base and Future Milestone Years – Point and On-Road Mobile sources", presentation at Technical Advisory Group Meeting, May 29, 2019, available from https://www.aqmd.gov/docs/default-source/ab-617-ab-134/technical-advisory-group/presentation-may29-2019.pdf?sfvrsn=9.

[3] SCAQMD, Final 2016 Air Quality Management Plan, March 2017, available from http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp, p. ES-10.

[4] The Port Authority of NY and NJ, "Top 60 Worldwide Airport Comparison: World Passengers Traffic, Ranked by Passenger", Section 2.1.2 in 2019 Airport Traffic Report, May 2020.

[5] "SCAG Region Airport Passenger Forecast for 2020–2045", Table 3.3 in SCAG, "The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments" (Connect SoCal), adopted on September 3, 2020

[6] SCAG, Connect SoCal Certified Final Program Environmental Impact Report, State Clearinghouse #20199011061, May 2020, p. 3.3-60.

Response: The content of this comment is very similar to comment ATMP-AL010-142. As demonstrated in Response to Comment ATMP-AL010-142, the commenter compares basin-wide stationary source emissions to the predominantly mobile source emissions associated with airport operations. This comparison is misleading. Airport-related emissions are dominated by motor vehicle operations from passenger travel to and from the airport and aircraft operations (inclusive of the descent below mixing height, descent to ground, taxiing, startup, ascent from ground, and ascent to mixing height). A large portion of the emissions assigned to LAX come from sources operating beyond the airport property line and are, thus, not comparable to stationary sources which only report emissions that occur on the facility property. The more appropriate comparison would be to the basin-wide mobile source emissions.

The comment also compares the growth in LAX-related nitrogen oxides (NOx) emissions between 2018 and 2028 to the basin-wide NOx reductions expected from "Traditional Regulatory Measures" in 2022 and 2023 as reported in the SCAQMD 2016 Air Quality Management Plan (Table ES-2)[1]. Since these traditional regulatory measures are applied to stationary sources, this comparison is not appropriate for the reasons cited above. In addition, Table ES-2 provides the expected reductions from other measures, programs, and strategies in the overall control strategy, including incentive-based programs, CARB's further deployment of cleaner technologies (on-road, off-road), and federal reductions in state strategy, all of which would be both greater than those for traditional regulatory measures by 2028 and more applicable to the mobile sources that would be associated with LAX. The growth in LAX NOx emissions between 2018 and 2028 would represent only 1 to 5 percent of the reductions from these programs in 2022 and 2023.

The commenter also discusses the growth at LAX that is incorporated into the Southern California Association of Governments' (SCAG's) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal). Note that the growth at LAX would not be generated by the proposed Project, but, rather, by the forecasted demand for air travel. Please see Topical Response TR-ATMP-G-1 for more discussion of this issue.

With respect to the comment's general restatement of the Project-related air quality impacts identified in the Draft EIR, all Project-related air quality impacts are discussed in Section 4.1.1.5 of the Draft EIR. A summary of Project-related impacts is presented in Section 4.1.1.7 of the Draft EIR. Detailed air quality impact analysis data are included in Appendix C.

[1] South Coast Air Quality Management District, Final 2016 Air Quality Management Plan (AQMP), Table ES-2, March 3, 2017. Available: http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp.

ATMP-AL010-281

Comment: For existing conditions, the DEIR provides air pollutant data from a monitor on the north side of LAX, which is obviously very close to the project. However, the DEIR should

acknowledge that the prevailing wind direction is more westerly (from the west) than southerly,[7] and that local air quality monitoring data are not available for areas immediately east of the airport.

[7] This is reflected in wind rose information as well as figures in the paper by Hudda et al., "Emissions from an International Airport Increase Particle Number Concentrations 4-fold at 10 km Downwind", Environ. Sci. Technol. 2014, 48, 12, 6628-6635, https://doi.org/10.1021/es5001566

Response: Section 4.1.1.3.2.1 of the Draft EIR states that "[t]he prevailing wind direction at the airport is from the *west-southwest* with an average wind speed of roughly 6.4 knots (7.4 miles per hour [mph] or 3.3 meters per second [m/s])" (emphasis added), which clearly describes the prevailing wind directly as more westerly than southerly as the commenter notes. The Southwest Coastal Los Angeles Monitoring Station located at 7201 W. Westchester Parkway (referred to as the LAX Hastings site) is located less than 0.5-mile from Runway 6L-24R, is the most representative monitoring site of existing air quality conditions in the Project area, and includes contributions from existing LAX operations as well as local traffic around the airport as discussed below. No other local air quality monitoring site exists within the Project area immediately east of the airport, and page 4.1.1-29 of the Draft EIR discloses that the "Southwest Coastal Los Angeles Monitoring Station" is the "monitoring station that is most representative of existing air quality conditions in the Project area," and that "[t]he nearest representative monitoring station that monitors PM2.5 is the South Coastal Los Angeles County 1 Station."

ATMP-AL010-282

Comment: Project Relationship to LAX Capacity; Time Horizons and Cumulative Impacts

Throughout the DEIR, there are statements identifying that the ATMP does not increase the airport's capacity, which is a key reason why Tables 1 and 2 above show relatively minor differences between the "No Project" and "With Project" scenarios: i.e., the ATMP identifies that the air traffic volumes are the same for both scenarios (differences in aircraft emissions appear to be due to differences in the routing of aircraft on the ground). However, this conclusion is a result of the fact that the DEIR only considers the future year of 2028, immediately after the project construction is completed, and before its impact on LAX capacity is realized.

The DEIR identifies that the overall operational capacity of an airport is influenced by three key components – airfield, terminal, and landside – and that the most limiting factor is currently the four-runway airfield system, which begins to constrain annual capacity in 2029. Accordingly, the DEIR asserts that the project does not impact capacity in 2028, but the ATMP clearly appears to be one of a number of projects that are occurring over time to ensure that LAX is capable of handling unconstrained demand for the airport. This is further reinforced by a statement in Appendix B of the DEIR:

"Several terminal facilities at LAX have been in the process of being modernized to ensure the ability of aging terminal facilities and passenger processors to accommodate demand for air travel. These projects include the Midfield Satellite Concourse, the LAX Terminals 2 and 3 Modernization Project, and LAX Terminal 1.5 Project. Therefore, existing and planned terminal facilities would provide adequate processing facilities for all existing and planned passenger gates in FY 2028 and FY 2033."[8]

Past CEQA analyses conducted for each of the three projects mentioned as "ensur[ing] the ability…to accommodate demand for air travel" also only looked out to the year that their construction was complete, and also made statements about how they did not impact capacity.[9,10,11] The ATMP DEIR does compare the overall increases in airport emissions between 2018 and 2028 to CEQA significance thresholds (and finds that the increases are significant), but this is looking at growth over the time period needed to construct the project, not growth associated with the actual project.

There are at least two key issues with the ATMP DEIR continuing this paradigm of only considering impacts at the time of project completion:

1. The analyses do not consider "direct physical changes in the environment which may be caused by the project and reasonably foreseeable indirect physical changes in the environment which may be caused by the project" as required by CEQA Guidelines [§15064(d)]. The airport clearly needs to plan in advance and enact a number of projects in order to expand in the future, and the reasonably foreseeable impacts of individual projects are not realized at the time that their construction is completed. At a minimum, the DEIR should include an analysis of the impacts of the capacity-increasing aspects of projects, even if they are being completed in advance of the point in time where the terminal's overall capacity is limited by them (as it seems that they would always be).

[8] ATMP DEIR, p. 6-5; Ricondo & Associates, "Los Angeles International Airport: LAX Airfield and Terminal Modernization Project – Draft Activity Forecasts Report", August 2020 (in "Activity Forecasts and Operational Analyses", Appendix B to the ATMP DEIR), p. 4-6.
[9] "the MSC North Project would not alter the airspace traffic, runway operational characteristics, or the practical capacity of the Airport. As such, changes in emissions from aircraft operations over the 2012 existing conditions are due to increased travel demand and changes in aircraft fleet mixes that are projected to occur by 2019 irrespective of the proposed MSC North Project." (LAWA, DEIR for LAX Midfield Satellite Concourse, Section 4.1, p. 4-40.)
[10] "the proposed project would not alter the airspace traffic, runway operational characteristics, or the practical capacity of the airport; therefore, the proposed project would not increase the number of daily flights arriving and departing from LAX or the growth in aviation activity at LAX that is projected to occur in the future." (LAWA, DEIR for LAX Terminals 2 & 3 Modernization Project, Section 6, p. 6-3.)
[11] "The proposed project, including the removal of Gate 10, would not increase airport capacity or affect the routing of aircraft in the air to and from LAX. No change in air traffic patterns would occur and no change in safety risks would result. Therefore, no impact

would occur and no mitigation is required." (LAWA, Final Initial Study/Mitigated Negative Declaration for LAX Terminal 1.5 Project, p. B-70.)

Response: The content of this comment is similar to comment ATMP-AL010-50; please refer to Response to Comment ATMP-AL010-50.

ATMP-AL010-283

Comment: For nonattainment pollutants their precursors, such an analysis is also required by Federal General Conformity regulations: i.e., the analysis of a project's conformity with the California's EPA-approved State Implementation Plan (SIP) for attaining the National Ambient Air Quality Standards (NAAQS) is required to be based on the total of direct and indirect emissions[12] from the action and must address the year during which the total of direct and indirect emissions from the action is expected to be greatest on an annual basis [40 CFR 93.159(d)]. 2028 is not "the year during which the total of direct and indirect emissions from the action is expected to be the greatest on an annual basis", and the DEIR underestimates the latter by only estimating emissions during 2028. The EIR needs to evaluate the year during which the total of direct and indirect emissions from the action is expected to be the greatest on an annual basis (even if that capacity is a result of concerted projects on the airfield, terminal, and landside components of the airport) –which in turn is a function of the extent of the future terminal capacity that the ATMP provides.

[12] Indirect emissions means "those emissions… (1) That are caused or initiated by the Federal action and originate in the same nonattainment or maintenance area but occur at a different time or place as the action; (2) That are reasonably foreseeable; (3) That the agency can practically control; and (4) For which the agency has continuing program responsibility." [§93.152]

Response: The content of this comment is similar to comment ATMP-AL010-146; please refer to Response to Comment ATMP-AL010-146.

ATMP-AL010-284

Comment: 2. CEQA requires that EIRs discuss cumulative impacts—"the cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects" [§15355]—and that this discussion "reflect the severity of the impacts and their likelihood of occurrence" [§15064(d)]. The cumulative impacts section of the ATMP DEIR identifies other projects within the 2018-2028 timeframe, but does not actually evaluate the cumulative impacts when added to other closely related past or reasonably foreseeable future projects. Specifically, a formal projection of LAX capacity growth is identified in the Connect SoCal Regional Transportation Plan), and Appendix B identifies that the four-runway airfield system starts to constrain airport operations in 2029 but the existing terminal and landside

capacity is sufficient to handle unconstrained demand through 2033. Both of these indicate that it is reasonably foreseeable that the four-runway airfield system will be modified. However, this also was not analyzed anywhere in the DEIR. The ATMP DEIR needs to include a discussion of those cumulative impacts as prescribed by CEQA, not just an analysis of cumulative impacts between 2018 and 2028.

Response: There is no evidence or reason to suggest that future modifications to the four-runway airfield system at LAX are reasonably foreseeable. The objectives of the proposed Project are identified in Chapter 2 of the Draft EIR, which specifically states that the objectives of the airfield improvements are to "[e]nhance the safety and operational management of the LAX airfield while working within the limits of the existing 4-runway system (i.e., do not add or relocate runways)." LAWA does not have any plans at this time for future improvements to the 4-runway system that would materially alter the ability of the system to accommodate additional aircraft. Therefore, such improvements are not reasonably foreseeable. As per Section 15064(d)(3) of the State CEQA Guidelines, "[a]n indirect physical change is to be considered only if that change is a reasonably foreseeable impact which may be caused by the project. A change which is speculative or unlikely to occur is not reasonably foreseeable." Because future improvements to the 4-runway system are not reasonably foreseeable, such improvements are not appropriate for inclusion in the Draft EIR's cumulative impacts analysis. Please refer to Topical Response TR-ATMP-G-3 regarding the assessment of future environmental effects associated with the LAX Airfield and Terminal Modernization Project beyond the buildout year of 2028.

ATMP-AL010-285

Comment: Project Description/Characterization

The DEIR contains seemingly contradictory statements about the ATMP's impact on capacity. On one hand, it identifies the underlying purpose of the ATMP as being "integral to Los Angeles' plans to host the 2028 Olympic and Paralympic Games, with LAX serving as the main portal" and to "help LAX to prepare early for the continued aviation growth that is projected".[13] However, it then subsequently states that "the ability to accommodate the future aviation demand projected for LAX is not dependent on any of the improvements associated with the proposed Project".[14] The EIR needs to resolve these inconsistencies and quantify the extent to which hosting the Olympic and Paralympic games requires more capacity than what is predicted using the standard growth-projection methods identified in Appendix B.

[13] ATMP DEIR, p. 2-18.
[14] Ibid., p. 6-5. The context for this sentence could be interpreted as being only applicable to 2028, but still appears inconsistent with the earlier statement about the Olympic and Paralympic Games.

Response: The commenter asserts that the Draft EIR includes contradictory statements about the proposed Project's "impact on capacity", specifically as it relates to the ability of LAX to accommodate the 2028 Olympic and Paralympic Games.

As presented in Section 2.3.2.1 of the Draft EIR: "The LAX Airfield and Terminal Modernization Project would support the ongoing modernization of LAX, to provide excellent passenger service, to support the economic growth and prosperity of the Los Angeles region, and to work closely with neighboring communities to reduce airport-related impacts. The proposed Project would support the ongoing modernization of LAX by enhancing the safety and operational management of the airfield, particularly as related to runway exits as further described below in Section 2.4.1.2; providing a new concourse and terminal to improve the quality of the passenger experience and efficiency of passenger processing; and improving the roadway system to better route airport-related traffic away from the public roads that serve the community. These improvements would help LAX to prepare early for the continued aviation growth that is projected by LAWA, SCAG, and the FAA to occur at LAX over the next several decades. Additionally, the nature and timing of improvements included in the proposed Project are integral to Los Angeles' plans to host the 2028 Olympic and Paralympic Games, with LAX serving as the main portal for athletes, dignitaries, and visitors from around the world."

Although the proposed Project improvements are indicated in the Draft EIR as being "integral" to support Los Angeles' plans to host the 2028 Olympic and Paralympic Games, the Draft EIR did not suggest that hosting the events would not be feasible without the proposed Project improvements. Rather, as discussed in Section 2.3.2.2 of the Draft EIR, the proposed Project improvements would improve passenger experience, reduce busing activity among facilities, improve international and domestic passenger processing capabilities, and immigration and customs processes. All these improvements are integral to ensure that passengers traveling to attend the 2028 Olympic and Paralympic Games have a safe and positive customer experience through LAX. As documented in Section 4.3 of Appendix B.1 of the Draft EIR, the 2028 Design Day Flight Schedule was successfully gated under both the No Project and the proposed Project scenarios. Therefore, the Draft EIR did not suggest that the 2028 Olympic and Paralympic Games would not be able to be accommodated without the proposed Project improvements. Thus, no revisions to the Draft EIR are required. Please also see Response to Comment ATMP-AL010-9 for additional discussion regarding the relationship between the proposed Project and the 2028 Olympic and Paralympic Games.

ATMP-AL010-286

Comment: In addition, while Appendix B identifies the average delay for the build and no-build scenarios, its discussion of terminal and landside capacity does not clearly identify the extent to which the ATMP increases the airport's capacity to handle more passengers and aircraft. The final EIR should identify the extent to which the ATMP affects the airport's capacity to handle more passengers and aircraft.

Response: The commenter asserts that the Draft EIR did not clearly identify the extent to which the proposed Project terminal and landside improvements "increases the airport's capacity."

Contrary to the commenter's assertion, the Draft EIR technical analyses appropriately analyzed all components of the proposed Project, including terminal and landside. As stated in Section 6.3.2 of the Draft EIR, the overall capacity of an airport is influenced by each key airport system components of airfield, terminal, and landside. See Section 4.2 of Appendix B.1 of the Draft EIR for a discussion of the airfield system component analyses.

As noted in Section 3.4 of Appendix B.1, the projected passenger demand was developed independently from any existing or future constraints (e.g., operational or regulatory). Passenger demand, which drives the demand for commercial passenger aircraft operations (representing approximately 90 percent of all operations at LAX per Table 3-7 of Appendix B.1) is driven by socioeconomic drivers and the overall state of the economy (as discussed in Section 3.2 of Appendix B.1). Also, please see Topical Response TR-ATMP-G-1 for additional information regarding the factors influencing airline schedules and passenger demand.

The Design Day Flight Schedule (DDFS), documented in Section 1 of Appendix B.2, for the buildout year of the proposed Project improvements of 2028 included passenger demand commensurate with the results of the forecasts prepared for the Draft EIR.[1] The 2028 DDFS reflected anticipated unconstrained demand for passengers and commercial passenger aircraft at LAX. As stated in Section 4.3 of Appendix B.1, the 2028 DDFS was successfully gated under the Without Project gate layout. This provided evidence that, without the proposed Project improvements, LAX's terminal facilities assumed to be operational in 2028 would provide adequate terminal linear frontage to accommodate the anticipated commercial passenger aircraft fleet mix; and adequate processing capabilities which have been designed to be in balance with the number of available gates. Therefore, the terminal component would not represent a capacity limitation to accommodating passenger and aircraft demand in 2028, under either the proposed Project scenario or the Without Project scenario.

A detailed discussion of the landside component is provided in Section 4.3 of Appendix B.1. Accordingly, it has been documented that congestion in the Central Terminal Area (CTA) and surrounding roadways has not presented an obstacle to passenger growth. As discussed above, passenger demand analyzed in the Draft EIR was developed independently from any existing or future constraints, including landside or ground access constraints. Also, please see Topical Response TR-ATMP-G-1 for additional information regarding the factors influencing airline schedules and passenger demand.

[1] As documented in Tables 3-8 and 4-1 of Appendix B.1 of the Draft EIR, the forecast numbers of passengers and aircraft operations in 2028 is identical under both the unconstrained forecast scenario and the constrained demand scenario. That is because it is anticipated that airlines would begin to react to increased congestion and airfield delays around 2029, as documented in Section 4.4.3 of Appendix B.1.

ATMP-AL010-287

Comment: State Implementation Plan (SIP) Conformity

While the DEIR acknowledges the SIP that is submitted to EPA for purposes of assuring attainment of the National Ambient Air Quality Standards (NAAQS), there is little mention of the fact that sufficiently large projects in NAAQS nonattainment areas such as the SCAB—i.e., projects where emissions are not subject to stationary source permitting requirements—need to evaluate and (if necessary) make a determination of "General Conformity" with the SIP in accordance with 40 CFR 93. These determinations are technically the responsibility of the Federal agency issuing the approval (Appendix C of the DEIR identifies that the Federal Aviation Administration will be evaluating General Conformity[15]), but it is typically the responsibility of the project proponents to provide the information needed for the Federal agency to make that evaluation. In addition, the conformity determination is relevant to the DEIR given that (1) air quality modeling may be required and (2) such demonstrations can potentially result in the requirement for additional mitigation (potentially including the purchase of emissions offsets). Moreover, Federal agencies are precluded from approving projects unless General Conformity requirements are addressed and complied with. The EIR needs to provide information pertinent to the evaluation of the project's General Conformity with the SIP.

[15] CDM Smith, "Los Angeles International Airport Airfield and Terminal Modernization Project, Final CEQA Protocol for Conducting an Air Quality Impact Analysis of Criteria Air Pollutants," June 4, 2020 (in "Air Quality, Human Health Risk Assessment, Greenhouse Gas Emissions, and Energy", Appendix C to Los Angeles World Airports (LAWA), Draft Environmental Impact Report (Draft EIR) - Airfield & Terminal Modernization Project, Los Angeles International Airport, State Clearinghouse No. 2019049020, October 2020), p. 1-1.

Response: The content of this comment is similar to comment ATMP-AL010-146; please refer to Response to Comment ATMP-AL010-146.

ATMP-AL010-288

Comment: Health Impacts of Secondary Air Pollutants

The Supreme Court of California rendered a decision indicating that CEQA requires an EIR to contain discussions that estimate the specific human health effects that would occur as a result of a project's significant air pollutant emissions, or explain why such further evaluation is infeasible.[16] This case is referred to as the Friant Ranch decision.

The 2,509 lb/day of operations-related emissions increases of NOx identified in the DEIR are approximately 46 times greater than the CEQA significance threshold of 55 lb/day established by SCAQMD.[17] The DEIR determines that even with mitigation, this would remain a significant and unavoidable impact.

The DEIR acknowledges the Friant Ranch decision. However, it declines to conduct the necessary analysis suggesting it is unnecessary because EIRs for two other projects conducted the evaluation and found only small impacts:

"…the changes in emissions of ozone precursors and PM2.5 from a single project do not "move the dial" with regard to regional human health impacts. The models available to analyze regional impacts are designed to address large, regional changes in emissions, such as those due to proposed emission control regulations that affect emissions across an entire region. Given the uncertainties in emissions, dispersion modeling, and human health concentration-response functions, the conclusion reached in these two studies was that the results to human health impacts were not statistically different than zero (i.e., no change)".[18]

The two projects referred to were the airport Master Plan for San Jose's Mineta Airport (SJC) and the Inglewood Basketball and Entertainment Center (which did not have comparable NOx emissions to the proposed LAX expansion). The Mineta Airport EIR identified current (2018) NOx emissions of 3,853 lb/day (far below LAX's 30,690 lb/yr), projected that these emissions would increase by 5,325 lb/day by 2037 (19 years out),[19] and calculated that the maximum associated increase in ozone (averaged over a 4 km × 4 km area) was approximately 2 parts per billion (ppb) (8-hour average);[20] the 8-hour NAAQS and CAAQS for ozone are 70 ppb.

We reviewed the Mineta EIR and found no text identifying that the corresponding human health impacts were "not statistically different than zero (i.e., no change)", only that there were several conservative assumptions and that actual impacts could be as low as zero. The ATMP DEIR authors should include a citation to the Mineta EIR where it states that the impacts to human health were "not statistically different" than zero.

The ATMP DEIR compares the 10-year emissions increase calculated for this Project to the 19-year increase calculated for Mineta Airport, and concludes that:

"[i]f the proposed Project emissions were applied to the SJC site, the resulting health impacts from ozone would likely be the same as, or less than, those modeled for the SJC Master Plan Amendment Draft EIR…the resulting change in health end-point incidences would be <0.05 percent for both ozone and PM2.5 emissions."[21]

There are several flaws with the DEIR's discussion of this topic, including the following:

• As discussed previously, the DEIR does not accurately reflect the full extent of the increase in emissions that would result from the ATMP because it only identifies the increase in LAX emissions between 2018 and 2028.

• It does not identify how the "<0.05 percent" conclusion was arrived at. More importantly, it neglects the well-known fact that ozone impacts are not a function of project emissions alone, they are a complex function of NOx and VOC emissions in the surrounding environment, meteorology (including sunlight/temperature), and topography, all of which are different for Los Angeles than San Jose. Therefore, making

a quantitative statement regarding this project's ozone impacts based on applying its emissions to photochemical modeling conducted in San Jose is not valid.

• By providing only a percent change in "health end-point incidences", it does not fully address the statements in the Friant Ranch judgment that CEQA requires an EIR to make "a reasonable effort to discuss relevant specifics regarding the connection between two segments of information already contained in the EIR, the general health effects associated with a particular pollutant and the estimated amount of that pollutant the project will likely produce. This discussion will allow the public to make an informed decision, as CEQA requires."[22]

Specifically, the general public does not have an understanding of "health end-point indices", either on a technical basis or in an applied sense. Given the magnitude of the NOx emissions associated with LAX cumulatively, as well as the climate and topography of the SCAB as a whole, it is hard to imagine a site more deserving of photochemical grid modeling than this one. The DEIR should have conducted photochemical grid modeling. In addition, while the traditional "grid size" (averaging area) is 4 km × 4 km, it is recognized that efforts have been made to develop the photochemical grid model for neighborhood-scale analyses. The EIR should be revised to evaluate and explain the extent to which it is possible to meaningfully evaluate impacts more closely than the traditional 4 km × 4 km grid square. Given that the increase in annual NOx emissions over just a 10-year period is approximately 46 times higher than the SCAQMD's significance threshold, LAWA should "relate the expected adverse air quality impacts [pollutant concentrations] to the project's likely health consequences, per the Friant Ranch decision.

[16] *Sierra Club et al. v. County of Fresno* (2018) 6 Cal.5th 502, p. 21.
[17] ATMP DEIR p. 4.1.1-44.
[18] ATMP DEIR, p. 4.1.1-42.
[19] David J. Powers & Associates, Integrated Final Environmental Impact Report, Amendment to Norman Y. Mineta San Jose International Airport Master Plan, City of San Jose PP 18-103, SCH #2018102020, April 2020, available from https://www.sanjoseca.gov/your-government/department-directory/planning-building-code-enforcement/planning-division/environmental-planning/environmental-review/active-eirs/sjc-airport-master-plan-update, p. 72 and p. 87.
[20] Ramboll US Corporation, Mineta San Jose Airport Supplemental Air Quality Impacts Analysis, San Jose, California, October 2019 (available from https://www.sanjoseca.gov/Home/ShowDocument?id=61650), Appendix B, p. 9.
[21] ATMP DEIR, p. 4.1.1-48.
[22] *Sierra Club et al. v. County of Fresno*, p. 23.

Response: The content of this comment is substantively the same as comment ATMP-AL010-147; please refer to Response to Comment ATMP-AL010-147 for a complete response to this comment. With respect to the comment regarding the horizon year used in the analysis, please see Topical Response TR-ATMP-G-3.

ATMP-AL010-289

Comment: Toxics Health Risk Analysis

Health risks associated with operational emissions of Toxic Air Contaminants (TACs) from the 2028 build scenario are presented as "incremental" values, relative to either 2018 or the 2028 no-build scenario. DEIR Table 4.1.2-2 shows the incremental cancer risk from the Project's construction and operation declining between 2018 and 2028. This is in part because TAC emissions are a fraction of the emissions of volatile organic compounds (VOC)—which are identified as decreasing from 2018 to 2028—and emissions of particulate matter (PM)—which are identified as increasing only slightly (and not in excess of significance thresholds). However, the DEIR's health risk analysis has the same deficiency that was identified for the analysis of criteria air pollutants: i.e., not evaluating the actual impact of the proposed project on operations beyond 2028 (i.e., when the project actually makes a difference in the airport's emissions). As discussed above, the EIR should be revised to identify the reasonably foreseeable changes in emissions which may be caused by the Project.

Response: Please see Topical Response TR-ATMP-G-3 regarding the reasons why 2028 is the appropriate horizon year for evaluating the impacts of the proposed Project. For the reasons explained therein, the Draft EIR's analysis of health risks associated with operational emissions of toxic air contaminants is accurate and appropriate.

ATMP-AL010-290

Comment: Greenhouse Gases/Climate Change

As with the DEIR's analysis of criteria air pollutant emissions, the DEIR also underestimates the Project's increase in greenhouse gas (GHG) emissions because it does not evaluate the impact of the Project beyond 2028. The EIR should be revised to identify the reasonably foreseeable changes in the environment which may be caused by the project.

Response: Please see Topical Response TR-ATMP-G-3 regarding the reasons why 2028 is the appropriate horizon year for evaluating the impacts of the proposed Project. For the reasons explained therein, the Draft EIR's analysis of GHG emissions is accurate and appropriate.

ATMP-AL010-291

Comment: In addition, Section 4.4.2.2 should clearly identify the boundary of the aircraft GHG emissions inventory. While there is a logical basis for using the "mixing height" cutoff with regard to criteria pollutant emissions, there is not an analogous logical basis for using it for GHG emissions.

Response: Please see response to comment ATMP-AL010-305 for a discussion on why the mixing height used in the Draft EIR was selected as the boundary for GHG emissions. The need to clarify the boundary of the aircraft GHG emissions inventory is noted. In response, page 4.4-5 of the Draft EIR has been revised to identify the mixing height used in the GHG analysis. Please see Chapter F3, Corrections and Clarifications to the Draft EIR.

ATMP-AL010-292

Comment: Criteria Air Pollutant and GHG Mitigation

CEQA requires that EIRs identify the following with regard to mitigation:

"where several measures are available to mitigate an impact, each should be discussed and the basis for selecting a particular measure should be identified. Formulation of mitigation measures shall not be deferred until some future time. The specific details of a mitigation measure, however, may be developed after project approval when it is impractical or infeasible to include those details during the project's environmental review provided that the agency (1) commits itself to the mitigation, (2) adopts specific performance standards the mitigation will achieve, and (3) identifies the type(s) of potential action(s) that can feasibly achieve that performance standard and that will [be] considered, analyzed, and potentially incorporated in the mitigation measure." [§15126.4(a)(1)(B)]

The DEIR identifies on p. 4.1.1-43 that several types of mitigation measures (listed in Appendix C.9) were considered, but determines that most were "not applicable or feasible" with regard to the ATMP. It does not identify a clear basis for selecting the measures identified in the body of the DEIR. Several of the measures included in the DEIR (intended to address the ATMP's significant air quality and GHG impacts) include neither specific details nor the commitment or performance standards required by CEQA identified above. The DEIR should be revised to ensure that the mitigation measures comply with CEQA's requirements.

Response: Please see Topical Response TR-ATMP-AQ/GHG-1 regarding the evaluation of mitigation measures suggested by commenters to address significant air quality and/or GHG impacts. As noted in Topical Response TR-ATMP-AQ/GHG-1, the Draft EIR evaluated almost 100 potentially applicable measures for the reduction of air quality and GHG emissions across a broad range of mitigation types. This extensive evaluation resulted in the identification of 11 feasible mitigation measures that would address air quality and/or GHG emissions. As explained in the topical response, the measures included in the Draft EIR were selected because they would feasibly reduce impacts, while other measures were excluded because they were found to be infeasible, or not applicable to the Project. For example, several of the measures evaluated were not eligible to be considered as mitigation because they were already being implemented at LAX under existing LAWA programs and requirements, and/or would already be incorporated into the proposed Project as Project features. Several other potential measures were evaluated and determined to be either infeasible or not applicable to the proposed Project. The remaining measures were incorporated as mitigation for either air quality

impacts, GHG impacts, or both. However, not every identified measure would result in directly attributable or quantifiable reductions for significant air quality or GHG impacts, nor would every analyzed measure result in effective mitigation of significant Project-related impacts.

Contrary to the commenter's assertions, the mitigation measures identified in the Draft EIR do include specific details and the commitment and performance standards required by CEQA. For example, Section 4.1.1.5.2.2 on page 4.1.1-49 lists mitigation measures identified to reduce criteria air pollutants and/or GHG emissions. MM-AQ/GHG (ATMP)-5, Electric Vehicle Purchasing, requires LAWA to update the Electric Vehicle Purchasing Policy to require 100 percent of LAWA's light-duty vehicle fleet to be all-electric by 2031. This is an example of clear commitment and standards. For some mitigation measures, specific details are not available at this time. For example, for MM-AQ/GHG (ATMP)-4, EV Charging Infrastructure, the exact number and types of spaces could not be determined at the time the Draft EIR was drafted. However, the mitigation measure specifically states that these specifics will be determined during project design and provides a performance standard, stating that the measure "shall exceed the minimum requirements for EVSE and EVCS specified in the code at the time of design by at least 5 percent."

ATMP-AL010-293

Comment: The DEIR identifies the following significant impacts and proposed mitigation measures:[23]

1. Emissions of CO, VOC, NOx and SOx associated with ATMP construction would constitute a significant impact; the two proposed mitigation measures (MM) are:
   a. MM-AQ/GHG (ATMP)-1: Rock Crushing Operations (on-site crushing/waste reuse)
   b. MM-AQ/GHG (ATMP)-2: Use of Renewable Diesel Fuel (in construction equipment and on-site water trucks)
   c. MM- C (ATMP)-1. Construction Mitigation Oversight.
2. Increases in airport operational emissions of NOx, SOx, PM10, and PM2.5 between 2018 and 2028 would constitute a significant impact. Proposed MM:
   a. MM-AQ/GHG (ATMP)-3: Parking Cool Roof
   b. MM-AQ/GHG (ATMP)-4: Electric Vehicle (EV) Charging Infrastructure
   c. MM-AQ/GHG (ATMP)-5: EV Purchasing
   d. MM-AQ/GMG (ATMP)-6: Solar Energy Technology
   e. MM-T (ATMP)-1: Vehicle Miles Traveled (VMT) Reduction Program
3. Increases in GHG from construction and operations would constitute a significant impact. Proposed MM:
   a. All of the measures identified for #1 and #2 above
   b. MM-GHG (ATMP)-1. Demolition Waste (recycling)
   c. MM-GHG (ATMP)-2. Organic Waste Collection and Diversion
   d. MM-GHG (ATMP)-3. Green Procurement (adoption of a policy)
   e. MM-GHG (ATMP)-4. Enhanced Recycling (enhancing existing program)
   f. MM-GHG (ATMP)-5. Landscaping Water (non-potable water for landscaping)

Several of the measures are vaguely worded and/or contingent on the extent to which they are "feasible", available at a "comparable price", etc. Therefore, the measures do not provide concrete commitment that they will be implemented. Nor do they provide adequate information with regard to the criteria for how feasibility will be assessed, what is considered to be a "comparable" price, etc. For example:

[23] ATMP DEIR, Sections 4.1.1.5 and 4.4.5.

Response: The content of this comment is similar to comments ATMP-AL010-156 through ATMP-AL010-162 and ATMP-AL010-190 through ATMP-AL010-195; please refer to Responses to Comments ATMP-AL010-156 through ATMP-AL010-162 and ATMP-AL010-190 through ATMP-AL010-195.

Contrary to the commenter's assertions, the mitigation measures identified in the Draft EIR do include specific details and the commitment and performance standards required by CEQA. As defined in Public Resources Code, Section 21161.1, "feasible" means "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors." For example, Section 4.1.1.5.2.2 on page 4.1.1-49 lists mitigation measures identified to reduce criteria air pollutants and/or GHG emissions. MM-AQ/GHG (ATMP)-5, Electric Vehicle Purchasing, requires LAWA to update the Electric Vehicle Purchasing Policy to require 100 percent of LAWA's light-duty vehicle fleet to be all-electric by 2031. This is an example of clear commitment and standards. For some mitigation measures, specific details are not available at this time. For example, for MM-AQ/GHG (ATMP)-4, EV Charging Infrastructure, the exact number and types of spaces could not be determined at the time the Draft EIR was drafted. However, the mitigation measure specifically states that these specifics will be determined during project design and provides a performance standard, stating that the measure "shall exceed the minimum requirements for EVSE and EVCS specified in the code at the time of design by at least 5 percent."

ATMP-AL010-294

Comment: • MM-AQ/GHG (ATMP)-1: Rock Crushing Operations requires contractors to conduct rock-crushing on-site and reuse waste "to the maximum extent feasible (determined based on facility capacity and capability, project schedule, costs and regulatory conditions)". However, there is no commitment; i.e., there is nothing in the text to prevent a contractor from simply saying that rock-crushing and the reuse of waste is not feasible.

Response: The content of this comment is substantively the same as comment ATMP-AL010-178; please refer to Response to Comment ATMP-AL010-178.

ATMP-AL010-295

Comment: • MM-AQ/GHG (ATMP)-2 calls for use of renewable diesel fuel for equipment and trucks "as feasible based on commercial renewable fuel availability…at a "comparable price" and without incurring "a substantial transportation cost." Again, this could lead to no renewable diesel use at all; i.e., phrases such as "comparable price" and "substantial transportation cost" are subjective.

Response: The content of this comment is substantively the same as comment ATMP-AL010-157; please refer to Response to Comment ATMP-AL010-157.

ATMP-AL010-296

Comment: • MM-AQ/GHG (ATMP)-6 "requires LAWA to implement solar energy…where feasible based on [several factors]". Here too, there is nothing in this measure that requires LAWA to make any type of feasibility assessment and so there is no assurance that solar energy would be implemented as the measure would suggest.

Response: The content of this comment is substantively the same as comment ATMP-AL010-159; please refer to Response to Comment ATMP-AL010-159.

ATMP-AL010-297

Comment: For each of these measures, the DEIR is not (1) identifying a commitment to implement and (2) adopting specific performance standards the mitigation will achieve, as required by CEQA.

Response: The content of this comment is similar to comments ATMP-AL010-157, ATMP-AL010-159, and ATMP-AL010-178; please refer to Responses to Comments ATMP-AL010-157, ATMP-AL010-159, and ATMP-AL010-178.

ATMP-AL010-298

Comment: As mentioned previously, CEQA requires that "where several measures are available to mitigate an impact, each should be discussed and the basis for selecting a particular measure should be identified." Appendix C.9 lists 93 measures and states that "many of those potential measures are already being implemented at LAX under existing LAWA programs…. of the remaining measures, some were considered feasible to add as mitigation measures for the proposed Project, while others were determined to not be applicable or infeasible to include as mitigation measures for the Project" (p. C.9-1). However, the "remaining measures" text indicates that if a certain type of measure is already being implemented, there was not an evaluation of the extent to which more stringent commitments could be made.

Response: Please see Topical Response TR-ATMP-AQ/GHG-1 regarding the evaluation of mitigation measures suggested by commenters to address significant air quality and/or GHG impacts and Response to Comment ATMP-AL010-160 regarding the potential mitigation measures evaluated in Appendix C.9 of the Draft EIR. As noted in Topical Response TR-ATMP-AQ/GHG-1, the Draft EIR evaluated almost 100 potentially applicable measures for the reduction of air quality and GHG emissions across a broad range of mitigation types. This extensive evaluation resulted in the identification of 11 feasible mitigation measures that would address air quality and/or GHG emissions. As explained in the topical response, the measures included in the Draft EIR were selected because they would feasibly reduce impacts, while other measures were excluded because they were found to be infeasible, or not applicable to the Project. For example, several of the measures evaluated were not eligible to be considered as mitigation because they were already being implemented at LAX under existing LAWA programs and requirements, and/or would already be incorporated into the proposed Project as Project features. Several other potential measures were evaluated and determined to be either infeasible or not applicable to the proposed Project. The remaining measures were incorporated as mitigation for either air quality impacts, GHG impacts, or both. However, not every identified measure would result in directly attributable or quantifiable reductions for significant air quality or GHG impacts, nor would every analyzed measure result in effective mitigation of significant Project-related impacts. Where measures are already being implemented under LAWA's existing programs, policies, and initiatives, LAWA has already determined, with input from stakeholders, the maximum feasible extent to which these policies could be enhanced or made more stringent while still being achievable within a reasonable period of time, taking into account economic, environmental, legal, social, technological, and other factors.

ATMP-AL010-299

Comment: For GHG, the CEQA Guidelines require that mitigation measures may include "Off-site measures, including offsets that are not otherwise required" [§15126.4(c)(3)]. Table C.9-1 identifies that while the creation of "a carbon offset purchasing strategy" was considered (measure #32), "FAA takes the position that any use of funds by LAWA absent a specific regulatory requirement is prohibited by revenue diversion policies", citing a 1999 FAA policy. Given that CEQA does not include "specific" regulatory requirements for mitigation, it is unclear why LAWA is interpreting offsets as being different from any of the other mitigation measures. This should be explained in more detail.

Response: The content of this comment is similar to comment ATMP-AL010-194; please refer to Response to Comment ATMP-AL010-194.

ATMP-AL010-300

Comment: Also, Table C.9 does not quantify the emission reduction potential associated with the listed measures. While there is some utility to identifying potential mitigation measures, LAWA should identify those measures that would be most effective in reducing emissions.

Response: Please see Response to Comment ATMP-AL010-160 regarding the evaluation of measures included in Table C.9-1 in Appendix C.9 of the Draft EIR. As discussed in that response, the table includes many measures that were not considered in the Draft EIR analysis, for reasons identified in Table C.9-1. Therefore, providing the emission reduction potential for the measures listed in Appendix C.9 of the Draft EIR would not be of value to the Draft EIR analysis. With regard to the quantification of measures that were considered in the Draft EIR analysis, as discussed on page 4.4-6 in Section 4.4 of the Draft EIR, only certain LAWA policies and Project features would potentially produce emission reductions, which are specified on the same page. Page 4.4-7 of the Draft EIR itemizes the policies that are expected to reduce emissions but could not be quantified because information to determine the reduction quantities is not available or verifiable. Similarly, the emission reduction potential of the proposed mitigation measures cannot be effectively quantified for all of the measures. As stated on page 4.4-33 of the Draft EIR, only MM-T (ATMP)-1 would have sufficient data available for its emission reduction potential to be quantified. The other mitigation measures are more general in nature or are dependent on specific design characteristics that would be defined during more detailed levels of planning.

ATMP-AL010-301

Comment: As identified in Appendix C.2 of the DEIR, aircraft are the most significant source of operational NOx, CO, VOC, and SOx emissions from LAX, and account for roughly half of the GHG emissions (with most of the remaining half being from autos, while other sources comprise less than 10% of the total).[24] Table C.9-1 mentions "sustainable (renewable) aviation jet fuel" (Measure #7) and "alternative fuels"/"sustainable fuels" (Measure #23) for jets, yet there is no quantitative detail regarding the extent of the existing programs or project features at LAX. Nor is there any indication that LAWA considered ways to strengthen such measures to result in enhanced reduction of criteria air pollutant and GHG emissions (e.g., by increasing hydrant fueling infrastructure at existing gates). It is also not identified whether the fuels being referred to by these mitigation options included renewable-only fuels, California Low Carbon Fuel Standard-certified alternative jet fuels, or jet fuel formulations which are neither renewable nor LCFS-certified, but which emit fewer criteria air pollutants. Given the substantial amount of aircraft emissions generated at LAX, the evaluation of the feasibility of these measures needs to be described in more detail than is shown in Table C.9-1.

[24] It is important to note that contributions of mobile sources like aircraft and autos is a strong function of assumed trip lengths and the extent to which emissions during those trips are attributed to LAX.

Response: As detailed in LAWA's Sustainability Action Plan,[1] LAWA is committed to support sustainable aviation fuel (SAF), which is defined as fuel made from renewable materials, such as waste biomass or food scraps. The lifecycle emissions of SAF are estimated to be up to 80 percent lower than those of conventional aviation fuel. As further stated in the Sustainability Action Plan, supply and supply chain logistics are barriers to increasing the

use of SAF at LAX and, therefore, it is not feasible to provide a quantitative description of how the use of SAF would reduce GHG emissions because doing so would be speculative. However, as stated in the Sustainability Action Plan, LAWA has committed to studying SAF supply, logistics, and financing to identify strategies LAWA can deploy to increase SAF use at its airports. Similarly, identifying the specific types of SAF to be used at LAX in the future would be speculative.

[1] City of Los Angeles, Los Angeles World Airports, LAWA Sustainability Action Plan, 2019. Available: https://cloud1lawa.app.box.com/s/63i2teszgnld5aws68xbou6yc0inl5rp.

ATMP-AL010-302

Comment: In addition to the relatively high-level "big picture" comments that we have identified earlier in this letter, we have several detailed comments that are identified in Attachment A to this letter.

Response: Please see Responses to Comments ATMP-AL010-303 through ATMP-AL010-309 below, which address comments contained in Attachment A of the letter prepared by Tamura Environmental, Inc., which was included as part of the City of El Segundo's comments on the LAX Airfield and Terminal Modernization Project Draft EIR.

ATMP-AL010-303

Comment: Attachment A. Detailed Comments.

Below are detailed comments on the DEIR, that are in addition to the broader comments mentioned in the preceding letter.

Details of Emissions Calculations

The DEIR's Air Quality, Human Health Risk Assessment, Greenhouse Gas Emissions Appendix is over 1,200 pages long, but it does not identify key details of the analyses that were done. These omissions include, but are not necessarily limited to, the following:

1. Significance thresholds are on the basis of maximum pounds per day, and the DEIR identifies that even though the ATMP does not increase the airport's capacity in 2028, it is "integral to Los Angeles' plans to host the 2028 Olympic and Paralympic Games, with LAX serving as the main portal" (p. 2-18). Please provide details of how the demand associated with these plans were factored into the calculation of maximum daily emissions.

Response: The SIMMOD analyses for each scenario noted in Appendix C of the Draft EIR represent a reasonable estimate of the peak day operations for LAX. The design day forecasts used

to develop the inputs to the SIMMOD analyses are described in Appendix B of the Draft EIR and are based on operations during peak month of airport activity in the baseline period converted to a daily average. Please also refer to Responses to Comments ATMP-AL010-9 and ATMP-AL010-285 regarding demand associated with the 2028 Olympics. While the proposed Project improvements are integral to support Los Angeles' plans to host the 2028 Olympic and Paralympic Games, passenger levels expected in 2028 could be accommodated without the proposed Project improvements as documented in Section 4.3 of Appendix B.1 of the Draft EIR. The proposed Project would simply ensure that passengers traveling to attend the Games, including athletes, dignitaries, and visitors from around the world, have an efficient travel and positive customer experience through LAX.

ATMP-AL010-304

Comment: 2. Aircraft emissions are identified as being calculated using the FAA's Aviation Environmental Design Tool (AEDT) emissions model, but the only model inputs identified in Appendix C.2 appear to be those associated with SIMMOD activity, aircraft, and airframe/engine pairings. Other inputs are relevant to emissions, such as the assumed fuel sulfur content.

Response: As specified on page 4.1.1-10 in Section 4.1.1.2.3.1 of the Draft EIR, "…criteria pollutant emissions from aircraft were estimated using FAA's Aviation Environmental Design Tool Version 3b (AEDT 3b)." The model inputs to AEDT 3b are presented in Appendix C.2 of the Draft EIR. Certain model criteria, such as fuel sulfur content, were assumed to be default to the assumptions built-in to the AEDT 3b software. Such assumptions include the fuel sulfur content (0.06%), sulfur to sulfate conversion rate (2.4%), stage length-based aircraft fuel loadings, and other default parameters inherent to the AEDT 3b model.

ATMP-AL010-305

Comment: Furthermore, emissions inventories for mobile sources are completely a function of how much of their travel is incorporated (i.e., what the boundaries of the inventory are). For purposes of calculating the Project's criteria air pollutant emissions, the DEIR appears to have assumed that aircraft travel up to a mixing height of 1,806 feet[25] (which has some justification, for tropospheric pollutants) but the DEIR does not identify the boundary assumed in its calculation of GHG emissions. Was the same boundary used? If not, what boundaries were set for evaluating GHG emissions?

[25] ATMP DEIR, p. 4.1.1-10.

Response: The commenter requests clarification of the mixing height used in the Draft EIR for estimating aircraft-related greenhouse gas (GHG) emissions. The same mixing height used for the criteria pollutants was applied to the GHG emissions analysis, based on the specific mixing heights established by SCAQMD for the purposes of air quality modeling;

this is the same approach used to estimate regional aircraft GHG emissions presented in the aircraft emission reports developed for the SCAQMD 2012 and 2016 Air Quality Management Plans (AQMPs).[1,2] The approach used in the Draft EIR analysis for estimating aircraft GHG emissions focuses on the operational characteristics of aircraft at LAX, including aircraft engine time-in-mode for landing, taxiing/idling, and taking-off from LAX. The proposed Project would not create demand for flights to the Los Angeles region. As such, using a different boundary, such as the full flight, would not be appropriate because it would capture emissions not directly related to the proposed Project. The mixing height used in the Draft EIR is considered reasonable and appropriate for disclosing GHG impacts associated with the proposed Project. The need to clarify the boundary of GHG emissions in Section 4.4.2, Methodology, of the Draft EIR is noted. In response, page 4.4-5 of the Draft EIR has been revised. Please see Chapter F3, Corrections and Clarifications to the Draft EIR.

[1] South Coast Air Quality Management District, Draft Aircraft Emissions Inventory for South Coast Air Quality Management District, prepared by Integra Environmental Consulting, Inc., Tables 2.7 and 2.8 (CO2 emissions) and Table 3.2.1 (mixing heights), August 2016. Available: http://www.aqmd.gov/docs/default-source/planning/fbmsm-docs/aircraft-emissions-inventory-for-the-south-coast-air-quality-management-district.pdf.
[2] South Coast Air Quality Management District, Aircraft Emissions Inventory for 2008 and 2035, prepared by Integra Environmental Consulting, Inc., Tables 2.7 and 2.8 (CO2 emissions), and Table 3.2.2 (mixing heights), November 2012.

ATMP-AL010-306

Comment: 3. On-road vehicles are significant portions of the Project's operational emissions inventories and the quantification of their emissions can be a strong function of how exactly they were calculated. With regard to the trip lengths, was the CalEEMod® default of 20 miles (one-way) used, and if not, what was assumed? Page 4.1.1-7 of the DEIR identifies that EMFAC2017 was used (and off-model adjustment factors were applied), and Appendix C identifies speed-specific emission factors (and speed assignments to roadways), but the details of precisely which inputs to EMFAC2017 were used and how adjustment factors were applied are not explained in Appendix C. Please provide that explanation.

Response: While this comment refers to "operational" emissions inventory, it also cites to page 4.1.1-7 of the Draft EIR. That page discusses construction emissions sources, not operational emissions. As specified in Sections 4.1.1.2.1.2 and 4.1.1.2.1.3 of the Draft EIR, including in footnotes 25 and 29, the California Air Resources Board (CARB)'s EMFAC2017 Web Database, version 1.0.2, was used with CARB's EMFAC Off-Model Adjustment Factors to Account for the SAFE Vehicle Rule Part One to determine emissions associated with on-road construction equipment, including both worker vehicles and on-road trucks. The EMFAC2017 model was queried to determine emission rates by EMFAC2011 vehicle category for the Los Angeles (South Coast) region and by calendar year for each year of project construction (2022 – 2028). The "annual" season,

"aggregated" model year, and "all fuel types" options were selected. For on-site equipment, an average speed of 15 miles per hour was assumed. For off-site equipment, the "aggregated" speed option was selected. Appendix C.1 of the Draft EIR presents additional construction calculation assumptions, including the fuel types for all construction equipment and for worker vehicles assumed to be used throughout Project construction and the construction worker roundtrip distance (30 miles). The construction worker roundtrip distance was estimated based on data from the Vehicle Commuter Hours – Aggressive Schedule R1 spreadsheet, included as an attachment to the LAX Airfield and Terminal Modernization Program (ATMP) Air Quality Modeling Data & Assumptions report.[1]

[1] City of Los Angeles, Los Angeles World Airports, LAX Airfield and Terminal Modernization Program (ATMP) Air Quality Modeling Data & Assumptions, prepared by Connico Incorporated, September 2019 (with updates October 2019).

ATMP-AL010-307

Comment: 4. For off-road vehicles, p. 4.1.1-7 of the DEIR identifies that calculations were "based on" ARB's OFFROAD2017/ORION model, but the inputs identified on p. 18 of Appendix C are not in the format of inputs used in that model, and the outputs on pp. 21-27 are not OFFROAD2017/ORION outputs. The format of the data in Appendix C indicate that the calculations were done manually with a spreadsheet, but spreadsheet validation/sample calculations are not shown, only the results. The DEIR should have also provided the basis for the assumptions on pdf page 18 of Appendix C: i.e., 3% Tier 3, 30% Tier 4 Interim, 65% Tier 4 Final, with half of the Tier 3 engines identified as being equipped with 85% effective Diesel Particulate Matter (DPM) filters. Is LAWA committed to meeting this percentage?

Response: The commenter questioned the source for equipment emission rates used throughout the construction analysis. Emission rates for off-road vehicles were queried from the OFFROAD2017/ORION model for the Los Angeles (South Coast) region for each year of construction assuming all adopted rules for exhaust control, for aggregated equipment model years, and all horsepower bins and fuel types. By default, the model presents emissions in tons per day for the total modeled populations of each unique combination of equipment type, horsepower bin, fuel type, and calendar year. This default format is not useful for the air quality analysis as it presents gross emissions throughout the Los Angeles (South Coast) region for each equipment category, and not emission rates for single units of a given equipment category. To convert these emissions to the emission rates (pounds per hour), which are presented in Appendix C.1 of the Draft EIR, total regional emissions were converted to pounds per year and then divided by the total regional activity (hours per year) for each unique combination of equipment from the OFFROAD2017 model. Appendix C.1 of the Draft EIR presents only the emission rates for the unique combinations of equipment actually used in the Draft EIR air quality and greenhouse gas (GHG) emissions analyses.

The commenter questioned the use and origins of the construction modeling fleet assumptions of 5 percent USEPA Tier 3 compliance, 30 percent USEPA Tier 4 (interim) compliance, and 65 percent USEPA Tier 4 (final) compliance for heavy-duty offroad construction equipment. (It is assumed that the commenter's identification of the Tier 3 assumption as 3 percent instead of 5 percent was a typo.) LAWA's Design and Construction Handbook (DCH) requires all contractors to use 100 percent Tier 4 (final) compliant equipment if feasible. However, the policy leaves room for exceptions where good faith attempts to locate such equipment (documented to LAWA's satisfaction) demonstrate that such equipment is unavailable, at which point the next cleanest feasible equipment must be utilized.[1] The USEPA Tier distribution used in the Draft EIR calculation assumptions assumes that certain construction units may not be available at USEPA Tier 4 (final) standards during construction of the proposed Project. The 65-30-5 breakdown of Tier 4 (final) – Tier 4 (interim) – Tier 3 equipment used in the Draft EIR was based on monitored construction equipment data from recent LAX Community Benefits Agreement (CBA) Status Reports.[2, 3] These programs demonstrated that between 68 and 83 percent of heavy-duty offroad construction equipment used on airport projects in 2018 and 2019 were certified to Tier 4 (final) standards. The lowest bound of the monitored Tier 4 (final) levels was used to ensure proposed Project impacts represented a worst-case scenario. In reality, emissions would likely be lower than presented in the Draft EIR as a higher fraction of Tier 4 (final) equipment is expected to be utilized, as required by the DCH, for the majority of proposed Project construction.

[1] City of Los Angeles, Los Angeles World Airports, 2020 Design and Construction Handbook (DCH), Version 1.0, June 30, 2020. Available: https://www.lawa.org/en/lawa-businesses/lawa-documents-and-guidelines/lawa-design-and-construction-handbook.
[2] City of Los Angeles, Los Angeles World Airports, LAX Master Plan Community Benefits Agreement (CBA) - 2018 Annual Progress Report, June 2019. Available: https://lawamediastorage.blob.core.windows.net/lawa-media-files/media-files/lawa-web/lawa-our-lax/cba-status-report-2018.pdf.
[3] City of Los Angeles, Los Angeles World Airports, LAX Master Plan Community Benefits Agreement (CBA) - 2017 Annual Progress Report, June 2018. Available: https://lawamediastorage.blob.core.windows.net/lawa-media-files/media-files/lawa-web/lawa-our-lax/cbastatusreport2017.pdf.

ATMP-AL010-308

Comment: 5. Sulfur in fuel can be converted to either SO2 (IV oxidation state) or sulfate (SO42-, VI oxidation state) when combusted, and sulfate compounds (sulfates) can be an important contributor to total PM mass emissions from aircraft turbines.[26] Yu et al. (2019)[27] found that sulfates (measured at a distance of 30 meters from the aircraft turbine) could account for the majority of the PM mass emissions at high thrust.[28] However, the DEIR states (p. 4.1.1-2) that

"Sulfate compounds (e.g., ammonium sulfate) are generally not emitted directly into the air but are formed through various chemical reactions in the atmosphere; thus, sulfate is considered a secondary pollutant. All sulfur emitted by airport-related sources

included in this analysis was assumed to be released and to remain in the atmosphere as SO2. No sulfate inventories or concentrations were estimated for the criteria air pollutant analysis because the relative abundance of sulfates from fuel combustion is much lower than that of SO2, and because very little sulfur is emitted from Project sources. However, the trace amounts of sulfates identified in jet fuel are assessed in Section 4.1.2, Human Health Risk."

While some sulfate is certainly formed through chemical reactions in the atmosphere (and is therefore "secondary"), it is not categorically the case that all sulfate is a secondary pollutant. Therefore, the first sentence in the quotation above should be removed, and sulfate should not be categorically excluded from the PM inventory. The precise definition of "secondary" sulfate is an active topic of discussion; however, inventories of primary pollutants for ground-level combustion sources typically assume that at a minimum a small percentage of the fuel sulfur (2% or so) is converted to primary sulfate rather than being entirely converted to SO2. The DEIR does not provide evidence to support its assumption that sulfate compounds from aircraft would not contribute to PM 10 emissions or describe specifically how the PM emissions inventory was adjusted to remove sulfates. It should do so.

[26] Petzold et al., "Evaluation of Methods for Measuring Particulate Matter Emissions from Gas Turbines", Environ. Sci. Technol. 2011, 45, 3562–3568, dx.doi.org/10.1021/es103969v. This work was conducted with a jet fuel sulfur content of 300 ppmw = 0.030% (w/w).
[27] Zhenhong Yu, Michael T. Timko, Scott C. Herndon, Richard, C. Miake-Lye, Andreas J. Beyersdorf, Luke D. Ziemba, Edward L. Winstead, Bruce E. Anderson, "Mode-specific, semi-volatile chemical composition of particulate matter emissions from a commercial gas turbine aircraft engine," Atmospheric Environment, Volume 218, 2019, 116974, ISSN 1352-2310, https://doi.org/10.1016/j.atmosenv.2019.116974.
[28] This was for JP-8 fuel (satisfying Jet A fuel specifications) with a sulfur content of 1148 ppmw (0.11% w/w).

Response: As detailed in the AEDT 3b Technical Manual,[1] volatile sulfate particulate matter (PMSO) emissions are calculated for aircraft emissions throughout the Landing and Takeoff (LTO) cycle. The PM10 emissions, dispersed concentrations, and health risks and indices presented in Sections 4.1 and 4.4 of the Draft EIR are inclusive of particulate sulfate emissions originating from the combustion of jet fuel. The statement on page 4.1.1-2 in Section 4.1.1.1.1 of the Draft EIR that particulate emissions associated with sulfates were not included in emission calculations in the Draft EIR is in error. Section 4.1.1.1.1 of the Draft EIR has been revised to indicate that sulfates are included in the PM emissions. Please see Chapter F3, Corrections and Clarifications to the Draft EIR.

ATMP-AL010-309

Comment: 6. Overall, the DEIR should clearly identify key details associated with the emissions calculations. It may be preferable to show a single sample calculation for the various calculation steps.

Response: The comment is a summary statement based on the comments that precede the statement, asserting that key details of the emissions calculations were not provided in the Draft EIR. Please see Responses to Comments ATMP-AL010-303 through ATMP-AL010-308 above, which address those individual comments. As evidenced by the air quality impacts analysis methodology description presented in Section 4.1.1.2 of the Draft EIR, the analysis completed for the project addressed a variety of emission sources, which required the application of several different models and calculation and assumption approaches, specific to, and appropriate for, each emission type. The methodology description along with additional details provided in Appendix C of the Draft EIR provide the information necessary to understand the bases of the emissions calculations. It is not appropriate, to show a single sample calculation for the various calculation steps, as suggested by the commenter, given that the calculation methodology, approach, and assumptions vary by emission type. However, the general calculation equations for the primary emission sources are shown below:

Off-road construction equipment emissions were calculated using the following general equation:
- Daily emissions [lb/day] = (Emission factor [grams/hp-hr])* x (Equipment rating [hp]) x (Usage Factor) x (8 [hr/shift]) x (No. of shifts per day) x (1 lb / 453.49 grams)

* As calculated using OFFROAD2017, the emission factor includes the load factor for the specific equipment type.

On-road motor vehicle emissions for both construction and operations, were calculated using the following general equation
- Daily emissions [lb/day] = (Emission factor [grams/mile]) x (vehicle miles traveled per day [miles/day]) x (1 lb / 453.59 grams/lb)

Airport ground support equipment (GSE) emissions were calculated using the following general equation:
- Daily emissions [lb/day] = (Emission factor [grams/hp-hr])* x (Equipment rating [hp]) x (Daily operating hours [hrs/day]) x (1 lb / 453.49 grams)

* As calculated using OFFROAD2017, the emission factor includes the load factor for the specific equipment type.

Aircraft emissions were calculated using the following general equation:
- Daily Emissions = (No. of Engines per aircraft type) x (time-in-mode for each operating mode** [sec]) x (Fuel flue to each engine for each mode [lbs fuel/sec]) x (Emission index for each engine and operating mode [lbs pollutant / 1000 lbs fuel]) x (No. of daily operations per aircraft type)

** Operating modes include startup, taxi-out, takeoff, climb out, approach, and taxi-in.

ATMP-AL010-310

Comment: Re: CEQA Analysis for Midfield Satellite Concourse and ATMP

Dear Ms. Quintanilla:

On behalf of El Segundo, we have carefully reviewed LAWA's existing environmental analysis for the Midfield Satellite Concourse – South Project ("MSC South"), the next proposed phase of the Midfield Satellite Concourse ("MSC") Project, as well as the Notice

of Preparation ("NOP") for the LAX Airfield & Terminal Modernization Project ("ATMP"). On May 6, 2019, Shute, Mihaly & Weinberger submitted comments in response to LAWA's release of the ATMP NOP. This letter supplements the comments made in the May 6, 2019 letter and discusses additional information presented within LAWA's latest environmental document for MSC South, a memo from Ricondo & Associates ("Ricondo Memo").[1] This letter should be added to the administrative record for both the ATMP and MSC South. Ultimately, we believe that the Ricondo Memo is legally insufficient in analyzing the environmental impacts of MSC South, particularly in conjunction with the now-foreseeable ATMP.

[1] We learned of the Ricondo Memo by monitoring LAWA's Board of Airport Commissioners ("BOAC") agendas and then requested it from LAWA's staff. The memo does not appear to have been made publicly available through LAWA's website.

Response: This comment, and the remainder of the comments in Exhibit 4 of the comment letter submitted by Shute Mihaly & Weinberger on behalf of the City of El Segundo (i.e., comments ATMP-AL010-311 through ATMP-AL010-318), are comments submitted by the commenter on December 23, 2019 concerning Phase 2 of the MSC Program, commonly referred to as the MSC South project. Please see Topical Response TR-ATMP-G-2 for a discussion of the environmental analysis conducted for the Phase 2 project. As stated in the topical response, the environmental evaluation prepared by LAWA met the requirements of CEQA and no new environmental documentation was required pursuant to Section 15168 of the State CEQA Guidelines.

The commenter requests the letter dated December 23, 2019 be submitted as part of the LAX Airfield and Terminal Modernization Project EIR administrative record. Because the letter was included by reference in the commenter's comment letter to the Draft EIR, it is part of the comment letter that has been identified with the designation of ATMP-AL010. Therefore, although LAWA was not separately required by CEQA to respond to the letter on MSC Phase 2, LAWA has determined it is appropriate to respond to the allegations in that letter in the context of this Final EIR. The individual comments in the December 23, 2019 letter have been assigned comment numbers ATMP-AL010-310 through ATMP-AL010-318. Responses to these comments are provided in Topical Response TR-ATMP-G-2 and/or in the individual responses to comments below. This letter is part of the LAX Airfield and Terminal Modernization Project Final EIR and will be part of the Project's administrative record.

ATMP-AL010-311

Comment: A. LAWA Has Improperly Concluded MSC South May Proceed Without Further Formal Environmental Analysis.

Further CEQA analysis would be needed before LAWA could proceed with approval/construction of MSC South. MSC South, as currently envisioned by LAWA, is an entirely different project from that previously evaluated. For example, according to the BOAC August 1, 2019 Agenda staff report:

"The MSC South Project was originally envisioned to be an extension of the MSC North, with similar architecture, function, and scale. To build to this concept would require significant delivery time and investment, as well as necessitate the demolition of the American Airlines (AA) SuperBay Hangar, for which we have no adequate replacement in the near future. However, due to recent growth in passenger activity - as well as ongoing renovation efforts throughout LAX that requires the closure of other gates - there is an urgency to deliver more domestic gates in the near term. Moreover, *with the planned development of Terminal 9 and Concourse 0, there is no longer the same need to use MSC South as a fully functioning international terminal as was originally envisioned*."

BOAC August 1, 2019 Agenda Staff Report for Item 15 at 3 (emphasis added).

Thus, the MSC South project LAWA now wants to construct differs substantially from what LAWA previously evaluated. Moreover, MSC South is now inextricably linked to the ATMP and its environmental impacts must be evaluated together with that project.

Response: Please see Topical Response TR-ATMP-G-2 regarding BOAC's determination on Phase 2 of the MSC Program and the project-level environmental analysis conducted for the MSC Program, which included full buildout of the MSC. Please also see Topical Response TR-ATMP-G-2 regarding the relationship of Phase 2 of the MSC Program and the LAX Airfield and Terminal Modernization Project. As described in the topical response, Phase 2 of the MSC Program is, in fact, accounted for in the Draft EIR. Similarly, the comment that MSC South and the LAX Airfield and Terminal Modernization Project are "inextricably linked" is incorrect. As explained in the topical response, Phase 2 of the MSC Program will proceed with or without the LAX Airfield and Terminal Modernization Project and does not depend on the proposed Project in order to move forward.

ATMP-AL010-312

Comment: Furthermore, the 2014 Midfield Satellite Concourse Draft EIR ("2014 MSC DEIR") contains (at least) two references to future environmental review, particularly that construction emissions will be discussed under a project-level environmental review at such time that LAWA determines the timing of any future phase(s) of the MSC and that impacts of future projects will be analyzed on a project-level review once "LAWA determines the timing of such improvements." 2014 MSC DEIR at 2-51, 4-11, 4-19. LAWA must now follow through on its prior commitments to conduct project-level environmental review for MSC South.

Response: The commenter is correct that the MSC EIR states that LAWA will conduct a project-level review of future phase(s) of the MSC Program that discusses construction emissions when sufficient information about those plans is available. LAWA did exactly that. Please see Topical Response TR-ATMP-G-2 for a discussion of the environmental analysis conducted for Phase 2 of the MSC Program. As discussed in the topical response, LAWA has conducted the required project-level review. Please also see the topical response

regarding the Board of Airport Commissioners' (BOAC) decision to approve Phase 2 of the MSC Program.

ATMP-AL010-313

Comment: We object to the Ricondo Memo because it is not the kind of document contemplated by the 2014 MSC DEIR and, as discussed in detail below, it inadequately analyzes the project-level impacts of MSC South (see Section C below). The 2014 MSC DEIR indicated that LAWA would prepare and publicly release a formal CEQA document once the timing of the MSC South project was determined. Instead, LAWA has commissioned the Ricondo Memo. The memo was not circulated to the public for review as LAWA's CEQA documents normally are. And to our knowledge, it has not even been posted by LAWA on its website. Rather, we discovered the existence of the memo only by examining BOAC agendas. Simply stated, the Ricondo Memo does not provide the kind of formal and transparent project-level environmental analysis contemplated in the 2014 MSC DEIR for the future phases of the MSC Project.

Response: Contrary to the commenter's assertion, the MSC EIR does not state that LAWA would prepare and publicly circulate a formal CEQA document once the timing of the MSC South project was determined. Rather, the MSC EIR states that, "[f]or those MSC Program components receiving only programmatic environmental review in this EIR, further project-level environmental review under CEQA will be required in the future before they can be implemented." Please see Topical Response TR-ATMP-G-2 regarding the project-level environmental review conducted by LAWA for Phase 2 of the MSC Program. As stated in the topical response, LAWA conducted the required project-level review for the Phase 2 project and determined that no new environmental documentation was required pursuant to Section 15168 of the State CEQA Guidelines. Because no new environmental documentation was required, there was no requirement to issue a document for agency or public review. There was no legal challenge to the BOAC decision within the applicable statute of limitations period; therefore, the July 2019 analysis is presumed to be valid.

ATMP-AL010-314

Comment: The Ricondo Memo argues that no further CEQA review need be done. Their conclusion, however, is incorrect. Not only has LAWA already clearly committed to conducting further project-level environmental review for MSC, but LAWA's plans for MSC now differ substantially from what was analyzed in the programmatic 2014 MSC DEIR. Further CEQA review is triggered by those proposed changes to MSC South.

Response: Please see Topical Response TR-ATMP-G-2 regarding project-level environmental review of Phase 2 of the MSC Program and the Board of Airport Commissioners' (BOAC) determination that the scope of Phase 2 of the MSC Program is consistent with the future phase(s) of the MSC Program identified and analyzed in the MSC EIR.

ATMP-AL010-315

Comment: Finally, the Ricondo Memo does not acknowledge or evaluate the full extent of operations that would occur at MSC South as recently re-envisioned by LAWA. There would, for example, apparently be a greater concentration of operations at the eight proposed MSC South gates. Additionally, the 2014 MSC DEIR did not mention or recognize the ATMP as a future foreseeable project within its cumulative impact analysis. See 2014 MSC DEIR at 4-56 (table showing cumulative construction projects peak daily emissions estimates); see also id. at 3-5 to 3-7 (table listing on-going and future projects at LAX). LAWA must analyze the impacts of MSC South in light of any foreseeable impacts and projects, particularly the ATMP. This is critically important because the ATMP would increase the capacity of LAX well beyond that envisioned under the 2004 LAX Master Plan.

Response: The commenter is incorrect that the July 2019 analysis (referred to in this comment as the Ricondo memorandum) does not acknowledge or evaluate the full extent of operations that would occur at the proposed MSC South, and that LAWA must re-analyze the impacts of MSC South Project (Phase 2 of the MSC Program). Please see Topical Response TR-ATMP-G-2 regarding the environmental analysis for Phase 2 of the MSC Program and the relationship of Phase 2 of the MSC Program in the LAX Airfield and Terminal Modernization Project EIR. As described in the topical response, Phase 2 of the MSC Program was included in the No Project Alternative (Alternative 1) described in Section 5.4.2.1 of the Draft EIR and in the "No Project" and "With Project" scenarios described in Appendix B.2. It was also included in the list of projects considered for the cumulative impact assessment in Table 3-1 of the LAX Airfield and Terminal Modernization Project Draft EIR.

The commenter asserts, without providing any specific citations, data, or evidence, that the proposed Project improvements would "increase the capacity of LAX well beyond that envisioned under the 2004 LAX Master Plan." The assumptions contained in the 2004 LAX Master Plan are not relevant to the current analysis, which was expressly designed to "respond to local and regional demand for air transportation during the period 2000 to 2015".[1] The Notice of Preparation for the LAX Airfield and Terminal Modernization Project was published in April 2019. Moreover, none of the elements of the proposed Project was contemplated in the 2004 LAX Master Plan. With respect to the future activity levels at LAX with implementation of the proposed Project, Appendix B of the LAX Airfield and Terminal Modernization Project Draft EIR clearly analyzed the anticipated effects of the proposed Project improvements. As discussed in Section 3.6 of Appendix B.2 of the Draft EIR, the forecasted aircraft operations and passenger demand (and airline scheduling practices to meet such demand) would not change as a result of the proposed Project improvements. Therefore, contrary to the commenter's assertion, the proposed Project improvements would not result in an increase in capacity at LAX. Please also see Topical Response TR-ATMP-G-1 regarding future aviation activity at LAX.

[1] City of Los Angeles, Final Environmental Impact Report for the Los Angeles International Airport (LAX) Proposed Master Plan Improvements, Chapter 2, April 2004.

ATMP-AL010-316

Comment: B. In the Context of the ATMP, LAWA Is Improperly Double Counting Removal of the WRGs, Which Must Already be Decommissioned as Part of the MSC Project.

As stated in the ATMP NOP, LAWA is considering "replacing" nine West Remote Gates ("WRGs"), which it indicates will need to be removed for extension of Taxiway D. LAWA's ATMP proposal calls for that replacement to occur with new gates within Terminal 9 and/or Concourse 0. In the ATMP context, LAWA takes "credit" for removing WRGs, arguing that their removal will offset new gates proposed at Terminal 9 and Concourse 0. The problem with LAWA's logic here is that those are the same WRGs that LAWA already promised it would remove as part of the MSC project. This is improper double counting.

The 2014 MSC DEIR explicitly states that the WRGs will be decommissioned upon completion of the MSC project. Specifically, in Section 2.2 of the 2014 DEIR, LAWA quotes from the LAX Master Plan that the MSC "would replace the remote gate pads now located on the west pad facility . . . . (Final LAX Master Plan page 2-85)." 2014 MSC DEIR at 2-5. In Section 4.1.2.1 of the 2014 MSC DEIR, LAWA states that "[o]nce the future phase(s) of the MSC Program is completed, the West Remote Gates/Pads would be eliminated." Id. at 4-16, fn.10. Additionally, in response to comments in the MSC Final EIR ("FEIR"), LAWA confirms that they "will decommission the West Remote Gates/Pads once the future phase(s) of the MSC Program is completed, consistent with the approved 2004 LAX Master Plan." MSC FEIR at 2-20, 2-31.

LAWA's ATMP NOP ignores LAWA's prior commitment, as part of the MSC project, to remove the WRGs. As described in the ATMP NOP, LAWA proposes to add a total of 27 new gates. LAWA indicates the new ATMP gates will be replacing ten gates from the American Eagle Commuter Gates (removed to make way for Terminal 9, with those operations moved to MSC South) and 9 WRGs (removed to make way for the extension of Taxiway D). LAWA cannot, however, take credit for removal and replacement of nine WRGs as part of the ATMP, when those WRGs must already be decommissioned as a result of the MSC Project. LAWA appears to be double counting the WRGs to downplay the substantial increase in gates proposed at LAX. LAWA must instead fully acknowledge its proposal to increase the number of gates at LAX well beyond what was evaluated in the operative 2004 LAX Master Plan. LAWA's CEQA analysis must also acknowledge that there is a substantial functional difference between remote gates (like the WRGs and the American Eagle Commuter Gates) and contact gates like those proposed for MSC South, Terminal 9 and Concourse 0. Because remote gates require bussing, they are far less efficient and support fewer operations.

Since the 2014 MSC EIR and LAX Master Plan commit LAWA to eliminating the WRGs upon completion of the MSC project, LAWA cannot also rely on removal of the WRGs to offset any potential gate increases from the ATMP. LAWA must instead evaluate the full environmental impacts of the 27 gates that will be added as part of the ATMP.

Response: Please see Topical Response TR-ATMP-G-2 regarding the decommissioning of the WRGs as described in the LAX Airfield and Terminal Modernization Project Draft EIR, and the

consistency of this action with the MSC South Project (Phase 2 of the MSC Program). Please see Response to Comment ATMP-AL010-315 regarding the fact that the LAX Airfield and Terminal Modernization Project is not a component of the LAX Master Plan.

ATMP-AL010-317

Comment: C. LAWA's Environmental Analysis Improperly Ignores the Connection Between the ATMP and MSC Project.

Although LAWA readily acknowledges that MSC South and the ATMP are coordinated and interdependent projects, its environmental analysis does not reflect that reality. LAWA's current plan for MSC South calls for the eight new MSC South gates to serve as "empty chairs" during other airport modernization efforts (i.e., the ATMP). As such, CEQA mandates that the two projects must be evaluated in a unified and coordinated fashion, but LAWA does not appear to be taking that approach.

The Ricondo Memo fails to comply with CEQA because it fails to acknowledge that the ATMP is part of the MSC South project (or vice-versa), and therefore fails to disclose the environmental impacts of the "whole of [the] action." See Guidelines § 15378(a). LAWA has improperly piecemealed MSC South from the ATMP, despite acknowledging that due to "the planned development of Terminal 9 and Concourse 0, there is no longer the same need to use MSC South as a fully functioning international terminal as was originally envisioned." See BOAC August 1, 2019 Agenda Staff Report for Item 15 at 3. This clearly illustrates that MSC South and the ATMP are "part of a single, coordinated endeavor." *Assn. for a Cleaner Environment v. Yosemite Community College Dist.* (2004) 116 Cal.App.4th 629, 639.

CEQA prohibits "segmentation" of a project—the "chopping up [of] proposed projects into bite-size pieces which, when taken individually, may have no significant adverse effect on the environment." *Tuolumne County Citizens for Responsible Growth, Inc. v. City of Sonora* (2007) 155 Cal.App.4th 1214, 1223-24 ("*Tuolumne*") (quoting *Plan for Arcadia, Inc. v. City Council of Arcadia* (1974) 42 Cal.App.3d 712, 726); see also *Tuolumne*, 155 Cal.App.4th at 1229 ("when one activity is an integral part of another activity, the combined activities are within the scope of the same CEQA project" and must be analyzed together). CEQA instructs that "[w]here an individual project is a necessary precedent for action on a larger project . . . an EIR must address itself to the scope of the larger project." Guidelines § 15165. LAWA mentions that the MSC Project will function as an "empty chair" during ongoing renovation efforts throughout LAX that will require closure of other gates. Thus, the MSC is essentially an enabling project for the ATMP, such that MSC South is a foreseeable consequence of the ATMP's displacement of the American Eagle commuter gates, which LAWA has stated will be relocated to MSC South. Additionally, LAWA recently redesigned MSC South to serve more domestic flights partly due to the ATMP handling more international operations.

Even if MSC South and the ATMP are not evaluated as a single project, MSC South must be analyzed in light of the increase in passenger operations associated with the ATMP, which includes a combination of runway and terminal expansions. Thus, the ATMP will

change operations airport-wide, including at MSC South. LAWA must study MSC South's environmental impacts within this new context.

The ATMP proposal also includes new information which was not known and could not have been known at the time the 2014 MSC EIR was certified. That new information indicates that the significant MSC effects previously examined will be substantially more severe than previously acknowledged. Public Resources Code § 21166(c); CEQA Guidelines, Cal. Code Regs., tit. 14 ("Guidelines"), § 15162(a)(3)(B). Moreover, the ATMP proposal represents a substantial change with respect to the circumstances under which the MSC South project would be undertaken, which triggers revisions to the analysis in the 2014 MSC EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects. Public Resources Code § 21166(b); Guidelines § 15162(a)(2).

Response: Please see Topical Response TR-ATMP-G-2 regarding the relationship between the LAX Airfield and Terminal Modernization Project and Phase 2 of the MSC Program, which is also referred to as the MSC South project; the consideration of Phase 2 of the MSC Program in the LAX Airfield and Terminal Modernization Project Draft EIR, including both the cumulative impact analysis and the operational analysis; and the environmental analysis of the MSC Program and the Phase 2 project. Please also see Topical Response TR-ATMP-G-2 regarding the relationship between the LAX Airfield and Terminal Modernization Project and the relocation of the American Eagle commuter gates to the MSC. As described in the topical response, both the Phase 2 project and the relocation of American Eagle commuter gates to the MSC are separate projects with independent utility from the LAX Airfield and Terminal Modernization Project and both were properly accounted for in the LAX Airfield and Terminal Modernization Project Draft EIR in both the operational analysis and in the cumulative impact analysis.

Please see Topical Response TR-ATMP-G-1 regarding the commenter's implication that the LAX Airfield and Terminal Modernization Project would produce an increase in passenger operations; activity levels in 2028 are projected to occur regardless of whether the LAX Airfield and Terminal Modernization Project proceeds.

The commenter's statement that the LAX Airfield and Terminal Modernization Project would include runway expansions is incorrect; the project would reconfigure runway exits in the north airfield, extend Taxiway D to the west, extend Taxiways D and E to the east, and extend Taxilane C to the east. The proposed Project does not include runway expansions.

ATMP-AL010-318

Comment: D. The Ricondo Memo Fails to Analyze LAWA's Plans for the Future Expansion of MSC South.

The Ricondo Memo also fails to analyze foreseeable future expansion of MSC South. As illustrated in the diagram below, LAWA envisions that there will be 3 additional "Future AC Positions" on the west side of MSC South. See BOAC August 1, 2019 Agenda Staff Report for Item 15 at 5. These future positions are likely to be new gates that will be

opened once the American Airlines SuperBay Hangar is demolished and replaced (as contemplated by the 2014 MSC DEIR). LAWA has stated that there is no adequate replacement for the hangar in the near future, but demolition of the hangar and installation of additional gates is clearly part of LAWA's eventual plan for MSC South. To comply with CEQA, LAWA must analyze the entirety of its plan for MSC South.

[See original comment letter for figure.]

Response: Please see Topical Response TR-ATMP-G-2 regarding LAWA's environmental analysis of the overall MSC Program in the 2014 MSC EIR and the subsequent environmental analysis of the Phase 2 of the MSC Program. As noted in the topical response, there were no legal challenges to the BOAC decisions related to MSC within the applicable statute of limitations periods; therefore, these analyses and decisions are presumed to be valid. Accordingly, it is not necessary to respond to this comment, which exclusively addresses the MSC South project and does not relate to the proposed LAX Airfield and Terminal Modernization Project.

ATMP-AL011	**Jackson Sr., Christopher E.**	**City of Inglewood, Economic and Community Development Department**	**3/15/2021**

ATMP-AL011-1

Comment: The City of Inglewood has received the Notice of Availability of the Draft Environmental Impact Report (DEIR) for the Los Angeles World Airports (LAWA) Airfield and Terminal Modernization Project (Project). The draft document has been reviewed by: the Economic and Community Development (ECO) Department-Planning Division; the Residential Sound Insulation Department; and the Public Works (PW) Department-Transportation and Traffic Division. Below are their comments:

Response: LAWA thanks the City of Inglewood for its review of the Draft EIR. Please see Responses to Comments ATMP-AL011-2 through ATMP-AL011-6 below.

ATMP-AL011-2

Comment: ECD Department-Planning Division

1. The document indicates that the efficiency improvements associated with the Project will effectively facilitate an increase in daily aircraft operations (Table 4.7.1-10). Please ensure that this daily increase has been adequately considered in conducting all environmental topic areas.

Response: This comment is similar to comment ATMP-AL010-33; please refer to Response to Comment ATMP-AL010-33, and to Responses to Comments ATMP-AL010-205 through ATMP-AL010-207, for a discussion of the relationship between the reduction in delay in certain operating conditions and future aircraft activity levels at LAX. It should be noted that, as described in the introduction to Chapter 4 of the Draft EIR, the Draft EIR used an

existing conditions baseline (2018 or 2019) to analyze impacts related to future passenger and aircraft activity levels. Therefore, the environmental effects of the growth that is projected to occur between 2018 and 2028 were fully evaluated and documented in the Draft EIR in accordance with CEQA and the State CEQA Guidelines.

ATMP-AL011-3

Comment: Residential Sound Insulation Department

2. As you know, the City of Inglewood is in very close proximity to LAX and located under the flight path. Increasing daily flights should be carefully evaluated to ensure an accurate assessment of daily/ongoing noise impacts for people on the ground. Recently released results of the Federal Aviation Administration's (FAA) Neighborhood Environmental Survey (February 2021) determined that the method the FAA uses to measure noise annoyance is deeply flawed. The survey found that two-thirds of people living in the 65 db DNL noise contour of airports were highly annoyed by aircraft noise, compared to only 12.3 percent of people highly annoyed predicted by FAA's current methodology. The findings of this study necessitate a re-examination of the City of Inglewood noise contour map as the increase in daily aircraft operations will result in more noise in the current contours (Figure 4.7.1-9).

Response: Section 4.7.1 of the Draft EIR provides a comprehensive evaluation of potential aircraft noise impacts associated with the proposed Project, based on accepted/approved methodologies, models, and thresholds of significance. It is important to note that implementation of the proposed Project would not result in more aircraft operations at LAX than would otherwise occur without the Project. With regard to future aircraft noise levels at LAX, as discussed on page 4.7.1-16 in Section 4.7.1.2 of the Draft EIR, the change in future (2028) aircraft noise conditions compared to existing baseline conditions is attributable to growth in passenger activity and aircraft operations that is anticipated to occur at LAX by 2028 with or without the proposed Project. In other words, the proposed Project itself would have no effect on noise levels associated with aircraft operations; rather, the change in noise levels from 2018 to 2028 aircraft operations will be entirely attributable to growth in aviation activity that will occur with or without the proposed Project. Please see Topical Response TR-ATMP-G-1 regarding the aviation demand forecast and future aviation activity at LAX.

Please see Response to Comment ATMP-PC029-2 regarding the results of FAA's Neighborhood Environmental Survey.

ATMP-AL011-4

Comment: Public Works- Transportation and Traffic Division

3. In the VMT Reduction Plan there is mention of On Demand Micro-Transit Shuttles (page 4.8-53). The City looks forward to continuing the Employee Shuttle Program and

coordinating the operation, maintenance, and management of this VMT Reduction Plan as the program transitions into a permanent program.

Response: The commenter expresses its support for the employee shuttle program being developed in partnership with the City of Inglewood as described in MM-T (ATMP)-1, VMT Reduction Program, in the Draft EIR. Please also see Topical Response TR-ATMP-T-2 regarding VMT mitigation measures and monitoring for the LAX Airfield and Terminal Modernization Project.

ATMP-AL011-5

Comment: 4. As it relates to traffic analysis, it is unclear if the DEIR analysis/methodology includes the cumulative traffic impacts related to the Inglewood Basketball and Entertainment Center (LA Clippers Arena). Please confirm.

Response: The methodology for preparing the cumulative transportation impacts in Section 4.8.6.2 of the Draft EIR does account for the potential weekday (non-event) effects of the Inglewood Basketball and Entertainment Center (IBEC), also known as the Los Angeles Clippers Arena, under 2028 conditions. CEQA allows for the use of a travel demand model or a list approach that contains information about various future land use development projects. For the LAX Airfield and Terminal Modernization Project, the travel demand model approach was used to evaluate the Project and cumulative transportation impacts of the Project. To represent cumulative conditions, a modified version of the SCAG RTP/SCS model developed for the City of Los Angeles was applied for 2028 conditions. The travel demand model accounted for both planned and ongoing transportation improvements. The model's socioeconomic data was reviewed to verify that it accounted for 123 cumulative development projects in the vicinity identified by city staff from Los Angeles and the surrounding cities. Appendix G.7 of the Draft EIR provides a detailed list of these cumulative development projects. The socio-economic data in the Project Travel Demand Model was reviewed and, where necessary, adjusted to account for these cumulative development projects. The IBEC is not explicitly listed in the cumulative projects table in Appendix G.7, but the cumulative impacts analysis accounts for the travel demand of up to 300 employees and a commensurate level of visitors on the IBEC site under typical weekday (non-event) conditions. As set forth in the IBEC environmental impact report, many of the trips associated with the IBEC are trips that are relocated from Staples Arena in downtown Los Angeles, where the Clippers currently play their home games. In this respect, many of the trips associated with the IBEC are not new to the region, but are relocated trips. As such, these trips are already accounted for in the SCAG RTP/SCS model, along with growth anticipated to occur in the region.

ATMP-AL011-6

Comment: Based on the changes to Transportation and Noise that are projected to occur as a result of the Project, we would like to ensure that the impacts are mitigated to the maximum extent feasible.

Response: Mitigation measures to address transportation impacts are identified in Section 4.8.5 of the Draft EIR. As identified in that section, Mitigation Measure MM-T (ATMP)-1 includes a broad array of strategies for reducing Project-related vehicle miles traveled (VMT). With implementation of this measure, impacts related to employment VMT would be fully mitigated. In fact, it is expected that, with implementation of the mitigation measure, the amount of employee VMT reduction may exceed the amount required to mitigate the employee VMT impact in a given reporting year. Any excess mitigation (VMT reduction above and beyond the level of reduction needed to achieve the employee VMT performance goal of 20.4 VMT per employees) can be credited towards mitigation of the passenger VMT impact. In the event that the total amount of VMT reduction for the reporting year exceeds both the amount of VMT reduction required to mitigate the employee VMT impact and the amount of VMT impact associated with passengers, the excess mitigation can be credited towards the induced VMT impact.

Mitigation measures to address aircraft noise impacts are identified in Section 4.7.1.5.1.3 of the Draft EIR. As identified in that section, Mitigation Measure MM-AN (ATMP)-1 includes sound insulation programs for noise-sensitive uses that are newly exposed to 65 dBA CNEL or greater from airport operations in future years of the proposed Project. Similarly, mitigation measures to address construction traffic and equipment noise are identified in Section 5.7.3.5.2.2 of the Draft EIR. As identified in that section, Mitigation Measure MM-CN (ATMP)-1, includes construction noise control plans to address construction equipment noise at noise-sensitive receptors where construction noise impacts may be significant. Additional measures include MM-CN (ATMP)-2, setting construction scheduling to avoid the noisiest on-site construction activities, to the extent feasible, from 9:00 p.m. to 7:00 a.m., Monday – Friday; 6:00 p.m. to 8:00 a.m., Saturday; anytime on Sunday or holidays, and MM-CN (ATMP)-3, requiring stationary source equipment whose use is flexible with regard to relocation (such as generators and compressors) to be located at the greatest distance practical from noise-sensitive land uses. As discussed in Section 4.7.2 of the Draft EIR, roadway traffic noise impacts of the proposed Project would be less than significant and no mitigation measures are required.

ATMP-AL011-7

Comment: Thank you for considering our comments on the DEIR. As LAWA and City of Inglewood continue to drive major regional economic stimulus through development, transportation infrastructure, and job creation opportunities, we look forward to continued partnership.

Response: This comment is noted. The comments from the City of Inglewood will be included in the Final EIR for consideration by the decision-makers prior to taking any action on the LAX Airfield and Terminal Modernization Project.

ATMP-AL012 Naaseh, Saied City of Carson 3/22/2021

ATMP-AL012-1

Comment: The City of Carson has reviewed Los Angeles World Airport's (LAWA} draft Environmental Impact Report (EIR} for the proposed LAX Airfield & Terminal Modernization Project (ATMP) and is raising the following concerns that should be addressed in the Final Draft and Response to Comments:

1. Enhanced regionalization. The SBCCOG strongly supports prioritizing efforts to regionalize air traffic to other airports such as Ontario International Airport and Palmdale Regional Airport. As the world begins to emerge from the COVID-19 pandemic and as air traffic begins to return to pre-pandemic levels, there should be a concerted effort to encourage regionalization. Airport officials must begin looking into ways that will encourage major air carriers of both passenger and cargo loads to return to Los Angeles' regional airports, not only LAX.

Response: LAWA thanks the City of Carson for its review of the Draft EIR. This content of this comment is substantively the same as comment ATMP-AR002-2 from the South Bay Cities Council of Governments (SBCCOG); please refer to Response to Comment ATMP-AR002-2. Please also refer to Response to Comment ATMP-AL007-3 regarding other regional airports in relation to LAX and the LAX Airfield and Terminal Modernization Project Draft EIR.

ATMP-AL012-2

Comment: 2. Growth Projections. Although both SCAG and LAWA project air traffic growth at LAX regardless of the ATMP, it behooves all stakeholders to evaluate the long-term impacts of COVID-19 on previous growth projections. Although the current downturn in air traffic will likely rebound in the coming years, it is important to evaluate the long-term behavioral changes accelerated by the pandemic. For example, population centers may shift inland in the next 25 years due to the ability to work remotely and business travel may not return to previous levels.

Response: Please see Topical Response TR-ATMP-G-1 regarding the aviation demand forecast for LAX and the COVID-19 pandemic context. As documented in the topical response, uncertainties associated with the severity and duration of the contraction in aviation activity resulting from the COVID-19 global pandemic still exist in mid-2021. However, LAX has recently shown signs of post-pandemic recovery. The Draft EIR evaluates and discloses the impacts of the proposed Project when it would be fully operational in the buildout year of 2028. As a result of the COVID-19 pandemic, impacts analyzed in the Draft EIR are most likely commensurate to higher levels of activity than will actually occur in 2028. Thus, the Draft EIR's analysis of impacts related to passenger activity levels in 2028 can be considered conservative. Further, there is no evidence at this time that the COVID-19 pandemic has resulted in long-term behavioral changes that would shift population centers in any way that would impact the Draft EIR's aviation activity

forecast. Therefore, the aircraft operation and passenger forecasts prepared for the Draft EIR do not need to be revised.

ATMP-AL012-3

Comment: Additionally, it is imperative that evaluations be done to study if growth forecasts for other regional airports such as Ontario International, can accommodate their planned growth without additional infrastructure investments. Growth at Ontario will likely not perform to forecast levels if that facility cannot accommodate the additional air traffic, which could have long-lasting negative impacts on efforts at regionalization. If significant infrastructure expansion is needed to facilitate that growth, implementation of those improvements must be a top priority of the region. Otherwise, the ATMP will by default induce growth at LAX because the other airports will not be able to accommodate their increasing traffic and airlines will choose to go back to LAX because it will have the capacity and new facilities.

Response: The commenter asserts that evaluations of other regional airports, such as Ontario International Airport, be done to determine whether those airports can accommodate planned growth at those airports. Such an evaluation is outside the scope of the LAX Airfield and Terminal Modernization Project Draft EIR; however, the Draft EIR does contain an evaluation of the projected future growth at LAX relative to other regional airports based on SCAG projections (Draft EIR, Table 2-1 and Appendix B.1), which assumes that the constrained airfield system at LAX will result in a shift of some of the future demand to other airports in the region. While LAWA has no authority over the infrastructure of, and operational plans for, other airports in the region, LAWA will continue to be supportive of other regional airports' efforts to plan and operate in an effort to manage regional aviation. Please also see Response to Comment ATMP-AR002-2 regarding the share of future regional demand that would be accommodated at LAX and at other regional airports.

ATMP-AL012-4

Comment: 3. Traffic Impacts to the South Bay. The City of Carson believes that the draft EIR does not adequately evaluate impacts to motorists coming from the South Bay. Although CEQA may not require it, LAWA should not use the Vehicle Miles Traveled standard to avoid responsibility for the increased congestion on the critical thoroughfares that will directly result from this large airport expansion. In particular, LAWA should work with other stakeholders such as the SBCCOG, LA Metro, Caltrans, and surrounding cities who have been working together to identify freeway improvements and can do so again to address off site roadway mitigation improvements necessitated by this project. Even though LAWA may be have restrictions by the FAA on paying for these off-facility improvements, the impacts to these facilities occur, nonetheless. For example, it may prove beneficial for LAWA to work with other implementing agencies to address the Century Boulevard exit on the northbound 1-405 to allow motorists to head west on Century Boulevard without the need for a traffic signal.

Response: The content of this comment is essentially the same as comment ATMP-AL007-7; please refer to Response to Comment ATMP-AL007-7 and Topical Response TR-ATMP-T-1, which discuss the assessment of transportation effects associated with the LAX Airfield and Terminal Modernization Project that are not subject to CEQA, which was conducted in accordance with the City of Los Angeles Transportation Assessment Guidelines and with State law (SB 743; State CEQA Guidelines Section 15064.3). As indicated therein, traffic congestion is no longer used as a basis for determining significant impacts for land use projects and plans in California.

ATMP-AL013 Hahn, Supervisor Janice County of Los Angeles Board of Supervisors 4/1/2021

ATMP-AL013-1

Comment: Please accept the following comments on the Los Angeles World Airports (LAWA) Draft Environmental lmpact Report (DEIR) for the Los Angeles International Airport (LAX) Airfield and Terminal Modernization Project (ATMP). The Fourth District encompasses LAX and communities immediately along LAX's northern and southern boundaries, I want to ensure that my communities' voices are heard and incorporated into this project.

Response: LAWA thanks Supervisor Hahn for her review of the Draft EIR. Please see Responses to Comments ATMP-AL013-2 and ATMP-AL013-3 below. The comments from Supervisor Hahn's office will be included in the Final EIR for consideration by the decision-makers prior to taking any action on the LAX Airfield and Terminal Modernization Project.

ATMP-AL013-2

Comment: There are several specific comments I would like to offer on the DEIR and the development of the ATMP:

- While it may be using the appropriate metric with Vehicle Miles Traveled (VMT) to measure transportation impacts, LAWA has not sufficiently shown the ATMP's tangible impacts to communities like El Segundo and Manhattan Beach. This project should be able to reduce the amount of cars traveling to and from LAX on Lincoln Boulevard, Pacific Coast Highway, Sepulveda Boulevard, and Aviation Boulevard.

Response: The commenter states the Project should be able to reduce the number of cars traveling to and from LAX on Lincoln Boulevard, Pacific Coast Highway, Sepulveda Boulevard, and Aviation Boulevard. As stated in Topical Response TR-ATMP-T-2, the effectiveness of the measures included in MM-T (ATMP)-1, VMT Reduction Program, would result in a substantial reduction of daily employee VMT. This would reduce vehicles traveling on local roadways near the airport.

ATMP-AL013-3

Comment: • The ATMP should center its integration into Los Angeles' growing transit and multi-modal network. I understand that the Landside Access Modernization Program will provide a direct connection into LA's light-rail network. Also, ATMP is an opportunity to do more, including transportation demand management, incentives, and physical infrastructure, all of which would strengthen the connection between LAX and LA's growing transit and multi-modal opportunities. LAWA could set a new national standard through an ATMP that supports all the ways that people move around in Los Angeles.

Response: As indicated by the commenter, the LAX Landside Access Modernization Program will provide a connection to Los Angeles' light-rail system; specifically, with an LAX automated people mover (APM) station at the future Airport Metro Connector (AMC) Transit Station that will connect with the Crenshaw/LAX Line, as well as other modes of public transit. The LAX Airfield and Terminal Modernization Project would complement that function with the addition of an APM station at the proposed Terminal 9 and a corridor that would enable passengers at Concourse 0 to access a nearby APM station within the Central Terminal Area. With regards to transportation demand management and incentives related to the use of transit and multi-modal opportunities, the vehicle miles traveled (VMT) reduction strategies presented in Mitigation Measure MM-T (ATMP)-1 of the Draft EIR provides for such measures including, but not limited to, expanding LAWA's rideshare program, working through the LAX Transportation Management Organization to encourage and provide support, advice, and guidance to employers across the LAX campus in implementing telecommuting programs, providing on-demand micro-transit shuttles that would serve LAX passengers and employees, and marketing and promoting alternative transportation options. Those and other such measures are described in Section 4.8.5.2.2 of the Draft EIR. As noted in Topical Response TR-ATMP-T-2, in light of comments received on the Draft EIR, certain clarifications have been made to the description of potential VMT reduction strategies included in Section 4.8.5.2.2 of the Draft EIR as related to LAWA's Rideshare Program and related to telecommuting. Please see Chapter F3, Corrections and Clarifications to the Draft EIR, regarding incorporation of these changes into the Final EIR. These clarifications do not require any changes to the transportation analysis and do not alter the results or conclusions of the transportation analysis.

ATMP-AL013-4

Comment: I look forward to ongoing engagement around this project and appreciate your consideration of my comments.

Response: This comment is noted. The comments from Supervisor Hahn's office will be included in the Final EIR for consideration by the decision-makers prior to taking any action on the LAX Airfield and Terminal Modernization Project.

ATMP-PC001 Johnston, Mark R. None Specified 10/29/2020

ATMP-PC001-1

Comment: I am ok with adding terminal "0" as its really just an expansion of existing terminal "1". I don't see the need to rush terminal "9" until we see how plane travel rebounds and specifically international travel, considering you are just finishing a international expansion with the mid-field concourse which would at least serve multiple airlines, while terminal "9" would be United only at this point, thus you really have to make sure United really intends to expand its flight offerings, especially international. Also consider the fact that American announced something along the lines of not having LAX as a hub and it could be very well United could say the same thing and consolidate to SFO. People mover and road improvements still would be needed regardless.

Response: The comment will be included in the Final EIR for consideration by the decision-makers prior to taking any action on the LAX Airfield and Terminal Modernization Project. As documented in Table 2-2 of Appendix B.2 of the Draft EIR, Terminal 9, if approved, is assumed to accommodate United Airlines and STAR Alliance partners. In the 2018 baseline conditions, STAR Alliance partners operated across multiple terminals at LAX. Therefore, the Draft EIR analyses assumed the consolidation of STAR Alliance partners' operations together, closer to United Airlines' operations at Terminals 7 and 8, to achieve operational efficiencies. These assumptions remain valid today. Please see Topical Response TR-ATMP-G-1 for an explanation of LAX's expected recovery from the disruption caused by the COVID-19 pandemic.

ATMP-PC001-2

Comment: Also, any way to get rid of the blizzard of power poles and billboards around the airport? Makes the airport look cheap / junky and does not make for a good first impression.

Response: As noted in Chapter 2 of the Draft EIR, specifically on page 2-75, several billboards within the proposed Project area are planned to be acquired and/or displaced; acquisition/displacement of these billboards was previously approved as part of the LAX Landside Access Modernization Program. The locations of billboards in the Project area that were already anticipated to be acquired and/or displaced as part of the that program are shown on Figure 2-47 of the LAX Landside Access Modernization Program EIR. Figure 2-26b of the Draft EIR has been revised to include the locations of these billboards. The revised figure is provided in Chapter F3, Corrections and Clarifications to the Draft EIR.

The proposed Project would not directly add or remove any existing billboards. Signage, including billboards, on the Concourse 0 and Terminal 9 sites would be governed by the Los Angeles International Airport Sign District (City of Los Angeles Ordinance 183737). There are currently no above-ground power poles in the CTA or on the major thoroughfares leading to the airport entry (i.e., Century Boulevard or Sepulveda Boulevard), although above-ground power poles exist along secondary roadways in the vicinity of the proposed roadway improvements. The improvements associated with the

proposed Project are currently at a preliminary design level of planning. The determination as to whether existing utilities in the vicinity of the proposed terminal and roadway improvements or new utilities that would be added to serve the proposed improvements would be undergrounded would be determined at more advanced stages of planning.

ATMP-PC002 C., Julie None Specified 11/1/2020

ATMP-PC002-1

Comment: Hello. I have a question re: how this project will affect airport noise. I live directly to the side of LAX and I am already having issues with Airport noise My second question is - is there any soundproofing project currently in the works for the neighborhood? I live in Playa Del Rey on Falmouth Ave. I would appreciate having my patio doors replaced with soundproofed doors as other neighbors have received at no cost from an Airport budget in the past. Please let me know your thoughts. Thank you!

Response: The Draft EIR describes proposed Project impacts related to aircraft noise in Section 4.7.1.5. Figure 4.7.1-7 illustrates the aircraft noise contours (65, 70, and 75 Community Noise Equivalent Level [CNEL]) projected to occur in 2028 (the buildout year of the proposed Project) and identifies the land uses that would be newly exposed as compared to 2018 baseline conditions. Figure 4.7.1-8 identifies the area that is projected to experience a 1.5 dBA increase in noise exposure levels within the 65 CNEL contour relative to 2018 baseline conditions. Based on the noise contours provided in the figures, Playa del Rey is not expected to experience a change in noise exposure levels from the baseline year (2018) to the future year of the proposed Project buildout (2028) or have any areas which would be expected to experience a 1.5 dBA increase in noise exposure levels.

Please see Response to Comment ATMP-PC038-71 regarding mitigation for aircraft noise associated with the proposed Project, as well as sound insulation achieved under past LAX sound insulation programs. As noted in that response, Mitigation Measure MM-AN (ATMP)-1 would apply to noise-sensitive uses that would be newly exposed to 65 dBA CNEL or greater from airport operations in future years of the proposed Project. Property owners' eligibility for noise mitigation would be based upon FAA requirements and the LAX Part 150 Noise Exposure Maps in effect at the time of operation or completion of the proposed Project. In addition, as also noted in Response to Comment ATMP-PC038-71, homeowners have contacted LAWA about reinstating the Residential Soundproofing Program in the City of Los Angeles for eligible homeowners who did not participate in the sound insulation program previously. Recently, LAWA has taken steps to reinstate a "second chance" program for eligible homeowners.

ATMP-PC003 Trembath, Phil Spirit CHb Inc 11/7/2020

ATMP-PC003-1

Comment: How do I sign up for virtual meeting on 12/01/2020

Response: LAWA replied to the commenter via electronic mail on November 11, 2020. The reply included a link for the meeting registration.

ATMP-PC004 Cua, Hans None Specified 11/13/2020

ATMP-PC004-1

Comment: I am opposing LAX ATMP and expansion of concourse 0 and terminal 9. The expansion would cause international flights to be moved from Tom Bradley terminal to terminal 9.

Response: The reassignment of flights from existing terminals to Concourse 0 and Terminal 9 is not an environmental issue. Flights operating at Terminal 9 would include a combination of domestic and international flights, which would facilitate the transfer of passengers between international flights and domestic flights. Some, but not all, international flights currently operating out of the Tom Bradley International Terminal would shift to Terminal 9, as would also be the case in reassigning some domestic flights to Terminal 9 from other terminals at the airport (i.e., United Airlines operating out of Terminal 9 may reassign some international flights and some domestic flights from Terminals 7 and/or 8 over to Terminal 9, particularly if that would facilitate the easy transfer of passengers between such flights).

ATMP-PC004-2

Comment: Ongoing construction of this project would cause heavy traffic, noise, and pollution to the surrounding cities and neighborhoods.

Response: The comment is noted. Analysis of impacts related to transportation, noise, and air quality associated with construction of the proposed Project is provided in Sections 4.8, 4.7.3, and 4.1.1 of the Draft EIR, respectively. Additionally, the Draft EIR includes multiple mitigation measures (including Construction Noise Control Plans, Construction Scheduling, and Construction Mitigation Oversight) to minimize construction impacts. (See, e.g., Section 4.7.3 of the Draft EIR.)

ATMP-PC005 Moskin, Jeffrey M. Raintree Condo and Townhouse Assn 11/20/2020

ATMP-PC005-1

Comment: Can I get a copy of the CEQA document?

Response: On October 29, 2020, the City of Los Angeles published the Draft EIR for the proposed LAX ATMP. The Draft EIR is available on LAWA's website - https://www.lawa.org/atmp/documents. The commenter's email address has been added to the distribution list to receive future electronic notifications concerning the proposed Project, including notifications of the availability of the Final EIR and other project-related documents.

ATMP-PC006 Adams, Cary None Specified 11/12/2020

ATMP-PC006-1

Comment: The plans seem well thought-out especially considering the space constraints. Recalling the theme building when a kid, I worry it will become lost in all this new construction. Though it might have historic status, has there been any interest to rise it to a prominent level? Could a new structure be constructed in its place with it raised to the top? It's a real shame to loose the visual.

Response: The proposed Project would not have any impacts on the Theme Building at LAX. The nearest project element would be Concourse 0, which would be located over 800 feet to the northwest. Impacts to the Theme Building from construction of the LAX Automated People Mover and other related projects in the Central Terminal Area were addressed in the EIR prepared for the LAX Landside Access Modernization Program, available on LAWA's website at https://www.lawa.org/connectinglax/automated-people-mover/documents.

ATMP-PC007 Aelony, Shana None Specified 11/10/2020

ATMP-PC007-1

Comment: Please extend the comment period, together we can make this a much better project for the community and passengers

Response: On October 29, 2020, LAWA published the Draft EIR for the proposed LAX Airfield and Terminal Modernization Project. In accordance with the State CEQA Guidelines, the Draft EIR was originally circulated for public review for 47 days (two days more than the required minimum 45 days), with the review period originally closing on December 14, 2020. A virtual open house was launched on November 25, 2020 that provided detailed information about the proposed LAX Airfield and Terminal Modernization Project and the Draft EIR analysis. LAWA also held a virtual public meeting on December 1, 2020 that

provided stakeholders with a presentation on the proposed Project and the Draft EIR analysis, as well as an opportunity for questions and answers. The comment period for the Draft EIR was extended twice due to requests from the community and neighboring jurisdictions. It was initially extended by 60 days to February 12, 2021, and then extended again for an additional 31 days, for a total comment period of 138 days, with the comment period closing on March 15, 2021. LAWA determined that the two extensions of the comment review period, which resulted in a comment period that was more than triple the review time required by CEQA, coupled with the virtual open house and virtual public meeting described above, provided adequate time and information for public review of the Draft EIR.

ATMP-PC008 Francis, Grant None Specified 11/25/2020

ATMP-PC008-1

Comment: While traveling in my car southbound on Sepulveda, why do you need two lanes for left turns, at 96th st, when you can also get to the CTA by being in the far right lane and take the overpass, over sepulveda?

Response: The commenter is correct that access to the Central Terminal Area (CTA) from southbound Sepulveda Boulevard would be via the new flyover ramp; however, that new ramp does not connect to the proposed Terminal 9. Access to Terminal 9 from southbound Sepulveda Boulevard would be via a left turn at 96th Street and then a right turn at Jetway Boulevard. The left turn from southbound Sepulveda Boulevard to eastbound 96th Street would also provide access to the new Intermodal Transportation Facility-West, currently under construction, which would provide passengers with access to the CTA via the new LAX Automated People Mover that is also currently under construction. That left-turn movement from southbound Sepulveda Boulevard to eastbound 96th Street, and then on towards the Intermodal Transportation Facility-West is generally shown on Figure 2-22 of the Draft EIR. That figure has been modified to better illustrate that signalized intersection – see Chapter F3, Corrections and Clarifications to the Draft EIR.

ATMP-PC009 Williams, Ryan None Specified 12/2/2020

ATMP-PC009-1

Comment: How will this reduce the overall traffic at the airport and shift flights to other regional airports? We need less flights flying into LAX, not “more jobs”. Shift flights to other airports.

Response: Please see Responses to Comments ATMP-AR002-2 and ATMP-AL007-3 regarding other regional airports in relation to LAX and the LAX Airfield and Terminal Modernization Project Draft EIR.

ATMP-PC010 Rabkin, Alan None Specified 12/3/2020

ATMP-PC010-1

Comment: Thank you for the opportunity to comment on the Draft EIR for the Modernization Project. The Project is variously described throughout the report as a modernization, expansion, improvement, extension and other similar words. It is, of course, an expansion of the current terminal footprint at LAX and it comes with the various noise, traffic and pollution impacts that any expansion of this type would create.

Response: The comment is noted. Analysis of impacts related to noise, transportation, air quality, human health risk, greenhouse gas emissions, and hazardous materials associated with the proposed Project is provided in Sections 4.7, 4.8, 4.1.1, 4.1.2, 4.4, and 4.5 of the Draft EIR, respectively.

ATMP-PC010-2

Comment: First, our residence has been in out family for about 70 years and is a single owner property. We predate the most significant expansion efforts in the 70's, 80's 90's and more recently. We are clearly within the contours of noise and pollution as we are just one block North of the North Airfield and can see the airport perimeter fence at the end of our block. We are also on raised ground. I wish to mention two items that need clarification in the Draft EIR. They are: 1. Noise. It is acknowledged that noise will be an impact to those already within the 65 CNEL contours (which we are). The mitigation of those impacts per the MM-AN (ATMP)-1 mitigation program are a vague reference to FAA requirements and the LAX 150 NEM "then in effect" when the expansion is completed. This vagueness creates two issues. First, it does not provide adequate information as to likely mitigation to impacted residences such as ours under the assumptions in the Draft EIR. For example, whether acquisition of residences would be required if the assumptions of the Draft EIR proved to be an underestimate (such as in the Sunridge mitigation of the 1970's); or, if a new round of mitigation by soundproofing would be undertaken. The soundproofing mitigation of the late 1990's is now over 20 years ago; the quality of those soundproofing efforts have proven to not be lasting; and, under the Draft EIR what new soundproofing would be undertaken under current standards? It should be also noted for this category that the laws, rules and regulation regulating airport noise from an FAA/City standard are not necessarily binding under inverse condemnation/partial or full taking standards under California real estate laws. The precise nature of any anticipated mitigation, therefore, needs to be adequately defined so as to make the Draft EIR meaningful on the noise issue mitigation efforts rather than keeping those efforts vague and subject to some undefined future standard.

Response: As described in Section 4.7.1.5.1.3 of the Draft EIR, LAWA will update the existing Airport Noise Compatibility Study (Part 150 Study) in accordance with Title 14 CFR Part 150, which will include updates to the Noise Exposure Maps (NEMs) for LAX (see Mitigation Measure MM-AN (ATMP)-1, Sound Insulation Programs). Please see Response to Comment ATMP-PC038-71 regarding sound insulation.

It is important to note that the evaluation of aircraft noise impacts associated with the proposed Project, as presented in Section 4.7.1.5 of the Draft EIR, is not dependent upon the Part 150 Study, nor is the preparation and completion of the Part 150 Study dependent upon the conclusions of the Draft EIR or on the approval or disapproval of the proposed Project.

ATMP-PC010-3

Comment: Further, discussion of flow control or slotting of overnight arrivals and departures as to the noise aspect is not discussed in a meaningful way. Other airports, for example Toronto's urban airport, utilize flow control, slotting and curfew standards to attempt to further overnight noise abatement standards.

Response: "Slots" are proposed by the commenter as a means to control or abate aircraft noise. The FAA defines slots as "an authorization to either take-off or land at a particular airport on a particular day during a specified time period. This authorization is for a planned aircraft operation and is distinct from air traffic control clearance or similar authorizations. Slots, or limits on the planned aircraft operations, are a tool used…to manage air traffic at extremely busy airports, and to prevent repeated delays that result from too many flights trying to take off or land at the same time."[1]

Assuming the commenter is referencing Toronto Pearson International Airport as "Toronto's urban airport," the airport is not subject to U.S. regulations, which are further described below, because it is located in Canada. Transport Canada created the night flight restriction program at the airport, which limits the number of movements during the restricted hours (12:30 am to 6:29 am). They call it the "night flight budget." Toronto Pearson is the only airport in Canada to have a budget system. A measure that requires aircraft meet a certain noise level in order to operate at an airport is considered an airport access restriction in the U.S. A U.S. airport interested in implementing such a measure is required to conduct a Title 14 Code of Federal Regulation (CFR) Part 161 Study and get FAA approval.

Use of restrictive measures, such as a slot, requires a Title 14 CFR Part 161, Notice and Approval of Airport Noise and Access Restrictions, Study and FAA approval of the study and proposed restrictions. 14 CFR Part 161 was adopted as a result of the Airport Noise and Capacity Act of 1990 (ANCA) (PL 101-508, 104 Stat.1388). ANCA established two broad directives for the FAA: (1) establish a method to review aircraft noise, and airport use or access restriction, imposed by airport proprietors, and (2) institute a program to phase-out Stage 2 aircraft over 75,000 pounds by December 31, 1999 (Stage 2 aircraft are older, noisier aircraft [e.g., Boeing-737-200, Boeing-727 and DC-9)[2]. To implement ANCA, FAA amended Part 91 to address the phase-out of large Stage 2 aircraft and the phase-in of Stage 3 aircraft. In addition, Part 91 states that all Stage 2 aircraft over 75,000 pounds were to be removed from the domestic fleet or modified to meet Stage 3 by December 31, 1999, and subsequently in December 2015, aircraft under 75,000 pounds were required to be Stage 3. There are a few exceptions, but only Stage 3 or 4 aircraft greater than 75,000 pounds are now in the domestic fleet per ANCA regulations. FAA

adopted Title 14 CFR Part 161 to establish a method to review airport access or use restrictions for noise abatement.

Title 14 CFR Part 161 institutes a highly stringent review and approval process for implementing use or access restrictions by airport proprietors and sets out the requirements and procedures necessary to do so for new use or access restrictions or changes to existing restrictions. It requires an airport proprietor to prove that the proposed restrictions meet all six conditions that were outlined in ANCA:

1. Be reasonable, not arbitrary, not discriminatory
2. Not create an undue burden on interstate or foreign commerce
3. Maintain safe and efficient use of the navigable airspace
4. Not conflict with any existing Federal statute or regulation
5. Provide adequate opportunity for public comment
6. Not create an undue burden on the National Aviation System

A Title 14 CFR Part 161 Study was conducted by the Los Angeles World Airports (LAWA) and was completed in May 2014 as an attempt to provide meaningful noise relief to communities impacted by certain non-conforming aircraft departing to the east during the noise-sensitive hours of midnight to 6:30 a.m., when all other aircraft are able to take off to the west. The 14 CFR Part 161 application was disapproved by FAA on November 2014. In fact, the FAA has approved only one completed Part 161 Study to date as a result of litigation (for restricting Stage 2 corporate jets). Based on the FAA's approval track record and LAWA's experience in the previous Title 14 CFR Part 161 Study to assess the six required conditions described in 14 CFR Part 161, conducting such a study to institute slot controls as a means to control access and restrict the number of operations to abate aircraft noise at the airport will very likely be unsuccessful and not be approved by FAA. Therefore, proposing a slot restriction and gaining FAA approval to implement the restriction is not considered a feasible measure to address significant aircraft noise impacts.

[1] U.S. Department of Transportation, Federal Aviation Administration, Slot Administration - Slot Definition webpage, Available: https://www.faa.gov/about/office_org/headquarters_offices/ato/service_units/systemops/perf_analysis/slot_administration/slot_definition/, accessed May 1, 2021.
[2] U.S. Department of Transportation, Federal Aviation Administration, Title 14 CFR Administration Part 161 Notice and Approval of Airport Noise and Access Restrictions, New York Community Aviation Roundtable LaGuardia Airport Subcommittee Meeting, January 9, 2020.

ATMP-PC010-4

Comment: 2. Transportation. The Transportation discussion needs to include the impact of the expansion on off-airport parking in the communities of Westchester, Playa del Rey, Inglewood and El Segundo. With the advent of ride share services, it is far more practical for passengers and airport workers to elect to park their vehicles purportedly for free in

the communities mentioned to avoid the parking areas maintained by LAWA for paid parking. Such off-airport parking may or may not be legal but it is a major impact of terminal expansion, Expansion of terminals to include Terminals 0 and 9 will clearly exacerbate this issue and it is important that the Draft EIR reflect the significant and ongoing community impacts caused by off-airport parking by passengers and airport workers and what mitigation efforts might be taken to avoid this outcome (such as free or expanded economy parking lots or areas that would make off-airport parking less likely). For example, such lots might utilize easily available space along the Westchester Parkway corridor with shuttle services.

Response: The commenter asserts that the Draft EIR needs to address how the proposed Project would exacerbate existing parking problems in communities around LAX, particularly as related to passengers and airport workers seeking "free" parking.

As explained in Response to Comment ATMP-AL010-14, CEQA does not require such a parking analysis. Nevertheless, LAWA has provided the following information about parking for informational purposes.

LAWA is aware of this issue and has coordinated, and will continue to coordinate, with the nearby cities, Council District 11, community leaders, and local business representatives to implement measures to reduce such occurrences. It is important to note that LAWA does not have authority over the choices of the general public as to where and how they access LAX. LAWA can, however, utilize other means to help address the situation, such as: lease requirements with tenants of LAX regarding provisions for employee parking; LAX access agreements with transportation network companies (TNCs), such as Uber and Lyft, that includes the use of a "geofence" that identifies TNC trips and staging areas at LAX; LAX access agreements with transportation service providers, such as limousines and shuttles, regarding where staging is allowed (i.e., areas where their vehicles may wait to be called for a passenger pick-up); the provision of LAX employee parking lots available at no or low costs to employees; and the provision of incentives for employees to use public transit and/or vanpools/carpools.

Regarding LAX tenant lease provisions, LAWA now includes in all new leases a requirement that the lessee make an adequate number of parking spaces available for all persons needing access to the leased premises, including employees of the lessee. Regarding TNCs, LAWA utilizes a geofence through GPS tracking to determine exactly when each TNC vehicle enters airport property on a trip and communicates that information directly to LAWA. LAWA has an online LAX Ground Transportation Comment Form (https://www.flylax.com/lax-comments-and-contact-us/lax-ground-transportation) that provides a means for the public to report an inappropriate staging of a commercial vehicle (i.e., parked car in a neighborhood or retail lot), which a citation/fine can be issued to the driver through the LAWA contract with the operator. It should be noted that LAWA has a staging lot for such vehicles located close to the Central Terminal Area (CTA) (i.e., on the west side of Jetway Boulevard between Westchester Parkway and 96th Street) that is available free of charge. With regard to employee parking, LAWA operates several employee parking lots that are available to employees at a very low monthly rate. In addition, LAWA operates a very extensive vanpool/carpool program and offers employees numerous incentives to use public

transit for work commute, all of which serve to reduce the need for employee parking. In that regard, Section 4.8.5.2.2 of the Draft EIR presents several vehicle miles traveled (VMT) reduction strategies as mitigation for the proposed LAX Airfield and Terminal Modernization Project. Such strategies include, but are not limited to, expanding LAWA's rideshare program to all LAX employees, working through the LAX Transportation Management Organization to encourage and provide support, advice, and guidance to employers across the LAX campus in implementing telecommuting programs, providing on-demand micro-transit shuttle service, and marketing and promoting alternative transportation options. Here too, implementation of these VMT reduction strategies would serve to reduce employee parking demands.

As noted in Topical Response TR-ATMP-T-2, in light of comments received on the Draft EIR, certain clarifications have been made to the description of potential VMT reduction strategies included in Section 4.8.5.2.2 of the Draft EIR as related to LAWA's Rideshare Program and related to telecommuting. Please see Chapter F3, Corrections and Clarifications to the Draft EIR, regarding incorporation of these changes into the Final EIR. These clarifications do not require any changes to the transportation analysis and do not alter the results or conclusions of the transportation analysis.

ATMP-PC010-5

Comment: Also related to transportation is a lack of discussion of more advanced transportation systems now being tested and likely to be implemented before the 2028 completion of this project. For example, Tesla and/or Virgin Hyperloop.

Response: Alternative transportation concepts like hyperloop technologies, as envisions by Tesla, Virgin, and others, are still in very early stages of development and testing, and the feasibility and timing of developing a large-scale hyperloop system in the Los Angeles area are unknown. To attempt to factor-in such a system in the transportation analysis for the proposed Project would not only be speculative, at best, but development and implementation of such a system is well beyond the scope of the Project.

ATMP-PC011	**McKinnon, Christopher**	**None Specified**	**12/5/2020**

ATMP-PC011-1

Comment: Please close the Central Terminal area to all traffic except passenger including taxi vehicle dropoffs and pickups. All other customers should use easily accessible train or people mover or pedestrian walkways to Hotel, Parking and Metro train or bus.

Response: The LAX Airfield and Terminal Modernization Project does not propose any changes to what type vehicles are allowed into the Central Terminal Area (CTA). Completion of the LAX Landside Access Modernization Program will help shift traffic out of the CTA and over to the new facilities east of the CTA, which connect with the new LAX Automated

People Mover. To close the CTA to all traffic, such as suggested by the commenter, is a policy decision beyond the scope of the proposed Project.

ATMP-PC012	**Lanza-Campos, Denia**	**Walsh Construction Company**	**12/7/2020**

ATMP-PC012-1

Comment: 1. What is the estimated construction cost for the ATMP Project? 2. Will the project be broken out into various smaller projects for bidding purposes? 3. What is the procurement delivery method for the ATMP project? Design Build, CMGC, Hard Bid?

Response: The construction cost of the overall LAX Airfield and Terminal Modernization Project is estimated to be approximately six billion dollars. The contracting approach and construction delivery methods for the various elements of the proposed Project have not yet been determined.

ATMP-PC013	**Grace, Patricia**	**None Specified**	**12/24/2020**

ATMP-PC013-1

Comment: I've been a long-time resident of Westchester and held a long-time ill feeling towards LAWA for taking land from the City. I have been watching LAWA work with the community and the construction to modernize. I must let you know that I'm very proud of our LAWA.

Response: This comment is noted. The comment will be included in the Final EIR for consideration by the decision-makers prior to taking any action on the LAX Airfield and Terminal Modernization Project. No further response is required because the comment does not raise any significant environmental issues. (See Public Resources Code Section 21091(d); State CEQA Guidelines Sections 15088(c), 15204(a).)

ATMP-PC014	**Su, Kevin**	**None Specified**	**12/1/2020**

ATMP-PC014-1

Comment: I was wondering roughly when will terminal 0 and terminal 9 begin ? When would general contractors began to bid for these projects ?

Response: Construction activities related to Concourse 0 and Terminal 9, including the associated enabling projects, is anticipated to begin in early- to mid-2022, respectively. The construction delivery methods for the various projects elements (i.e., bid-build, design-build, construction manager at-risk, public-private partnership, etc.), which would

influence the timing of when construction bids would be solicited, have not yet been determined.

ATMP-PC015 King, Coby None Specified 1/12/2021

ATMP-PC015-1

Comment: And here is a similar letter from the Neighborhood Council of Westchester Playa.

Response: This comment is noted. A response to the comment letter from the Neighborhood Council of Westchester Playa is provided in Response to Comment ATMP-PC039-1.

ATMP-PC016 Proffitt, Janet Lee None Specified 1/14/2021

ATMP-PC016-1

Comment: I want to make a comment on the airport noise and DIRT. There is a thin black covering to my outdoor table overnight -- no way can you use it without first cleaning it off. I think we are breathing this in our lungs, and who knows what the damage is? It is far more important than the noise, although that is important too.

Response: Impacts from noise are addressed in Section 4.7 of the Draft EIR. With respect to the "dirt" mentioned in this comment, the term "deposition" refers to the gravitational fallout of material (both solid and liquid) from the atmosphere. Commonly, this material, called particulate matter, consists of dust and soot that can form deposits or cause discoloration on outdoor surfaces (e.g., building materials, motor vehicles, small water bodies, etc.). Deposition of particles and soot is a common occurrence in urban and suburban areas. Though often thought to be associated with airports and aircraft, various studies of deposition have not found any such link.[1,2,3,4,5,6,7]

In addition to these studies, researchers studying the deposition of particulate matter (PM) and trace metals to Santa Monica Bay and the bay watershed determined that the bulk of material being deposited was in particle size categories greater than 10 micrometers in diameter, meaning greater than PM10.[8] Particles of this size are not emitted by aircraft, nor do the aircraft emitted particles ever coagulate/aggregate into particles larger than approximately 0.05 micrometers in diameter.[9] Particles of the size emitted by aircraft do not settle out by gravity (referred to as sedimentation), but are carried downwind for large distances before being removed through rainout/washout or dry deposition.[10]

Based on the findings of all of these studies, atmospheric deposition of soot, dust, and other forms of particulate matter occurs in measurable quantities in the vicinities of these large metropolitan airports. However, because air pollution in urban areas is generated by many different sources (both natural and man-made) and because many of the constituents are petroleum-based (e.g., burned and unburned fossil fuels), it is

infeasible to isolate and attribute the contribution of airports and aircraft on atmospheric deposition in urban areas. To date, the research results indicate that aircraft do not contribute substantially to deposition. It is similarly infeasible it isolate and attribute any health impacts caused solely by atmospheric depositions from airports and aircraft. Please also see Response to Comment ATMP-PC016-3 regarding health effects from deposition.

[1] Massport International, Memo: Summary of Two Logan Soot Studies, January 1997; KM Chng Environmental Inc., Soot Deposition Study: Logan Airport & Surrounding Communities, January 1997.
[2] KM Chng Environmental Inc., Charlotte/Douglas International Airport - Soot Deposition Study, March 1998.
[3] KM Chng Environmental Inc., Findings Regarding Source Contributions to Soot Deposition, O'Hare International Airport and Surrounding Communities, December 1999.
[4] South Coast Air Quality Management District, Inglewood Particulate Fallout Study Under and Near the Flight Path to Los Angeles International Airport, September 2000.
[5] City of Los Angeles, Los Angeles World Airports, Final Environmental Impact Report for Los Angeles International Airport (LAX) Proposed Master Plan Improvements, (SCH 1997061047), Technical Report 4, Attachment Y, Ambient Monitoring and Deposition Monitoring, prepared by Camp Dresser & McKee, Planning Consultants Research, and AeroVironment Environmental Services, April 2004. Available: https://www.lawa.org/en/lawa-our-lax/environmental-documents/documents-certified/2004-lax-master-plan-program/final-environmental-impact-report-feir.
[6] Clean Airport Partnership, Inc. and Environmental Consulting Group, Inc., Task 5: Investigating Air Emission Impacts on the Community, Particle Deposition from Airport Activities, prepared for Broward County Aviation Department, November 2006.
[7] Brick, William C., CCM, Chief-Departmental Operations, Monitoring and Technical Services Division, San Diego Air Pollution Control District, Electronic Mail Message to Brendan Reed, CEM, LEED-AP, Director, Planning and Environmental Affairs, San Diego County Regional Airport Authority, Subject: FW: Point Loma air sampling, January 11, 2016.
[8] Stolzenbach, et al., Measuring and Modeling of Atmospheric Deposition on Santa Monica Bay and the Santa Monica Bay Watershed, prepared by UCLA and the Southern California Coastal Water Research Project, 2001.
[9] Kinsey, John S., U.S. Environmental Protection Agency, Characterization of Emissions from Commercial Aircraft Engines during the Aircraft Particle Emissions eXperiment (APEX) 1 to 3, EPA-600/R-09/130, October 2009; and Whitefield, Philip D. et al., Transportation Research Board of the National Academies, Airport Cooperative Research Program Report 9: Summarizing and Interpreting Aircraft Gaseous and Particulate Emissions Data, 2008. Available: http://www.nap.edu/catalog.php?record_id=14197#toc.
[10] Friedlander, Smoke, Dust, and Haze - Fundamentals of Aerosol Dynamics, 2000.

ATMP-PC016-2

Comment: It is VERY upsetting when the airport does NOT designate a plane ready to land and sends him over the city of El Segundo. I can EVEN see what airline it is they are so LOW!! They should NOT be allowed to fly over the city -- NO EXCEPTIONS. Send them over Marina del Rey, NOT El Segundo! We are now building a new house in El Segundo in the same spot that our old house was (built in 1949).

Response: The comment does not address/comment on the Draft EIR nor does it relate to the proposed Project. As such, no further response is required.

ATMP-PC016-3

Comment: Has anyone looked into the health consequences of breathing the dust (fine and large particulates) that jet engines use? I believe sincerely that they SHOULD. The SCAMD at the very least should look into it.

Response: The South Coast Air Quality Management District (SCAQMD) has conducted a number of air quality and deposition studies at locations surrounding LAX.[1,2,3,4,5] In addition, other researchers have conducted studies regarding air quality near LAX.[6,7,8,9] These studies generally found that it was difficult to separate the contribution of emissions from LAX from vehicular emissions from heavily trafficked roads in the vicinity (e.g., Aviation Boulevard and the 405 Freeway). In addition, the Draft EIR addresses human health risks in Section 4.1.2 and Appendix C.6. The human health risk assessment was performed to assess potential health impacts from changes in toxic air contaminant (TAC) exposure, including particulate matter (or dust) from constructing and operating the proposed Project. The analysis considered TAC releases from a variety of stationary and mobile sources, including TAC released by aircraft.

[1] South Coast Air Quality Management District, Air Monitoring Study at Los Angeles International Airport, 1998.
[2] South Coast Air Quality Management District, Air Monitoring Study in the Area Los Angeles International Airport Part I, 2000.
[3] South Coast Air Quality Management District, Air Monitoring Study at Los Angeles International Airport Terminals, 2000.
[4] South Coast Air Quality Management District, Inglewood Particulate Fallout Study Under and Near the Flight Path to Los Angeles International Airport, 2000.
[5] South Coast Air Quality Management District 2001, Air Monitoring Study at Felton and Lloyde Schools, September.
[6] Westerdahl, D., S.A. Fruin, P.L. Fine, and C. Sioutas, "The Los Angeles International Airport as a source of ultrafine particles and other pollutants to nearby communities," Atmospheric Environment, 42, pp. 3143-3155, 2008.
[7] Fanning, E., R.C. Yu, R. Lu, J. Froines, Monitoring and Modeling of Ultrafine Particles and Black Carbon at the Los Angeles International Airport. Prepared for the California Air Resources Board and California Environmental Protection Agency, 2007.

[8] Los Angeles World Airports, Phase III of the LAX Air Quality and Source Apportionment Study (3 Volumes), 2013. Available: https://www.lawa.org/lawa-environment/lax/lax-air-quality-and-source-apportionment-study/final-report-and-materials.
[9] Wing, Sam E., Timothy V. Larson, Neelakshi Hudda, Sarunporn Boonyarattaphan, Scott Fruin, and Beate Ritz, "Preterm Birth among Infants Exposed to in Utero Ultrafine Particles from Aircraft Emissions," Environmental Health Perspectives, 128(4), 2020. Available:
https://ehp.niehs.nih.gov/doi/pdf/10.1289/EHP5732.

ATMP-PC017 Iselin, ODonnel None Specified 1/31/2021

ATMP-PC017-1

Comment: This is a terrible plan. More gates and no increase in road capacity into the airport hub. No realistic public transportation alternatives. This appears to reduce and not increase the road capacity into the airport from the North and adds considerable length to the drive into the airport and self parking facilities. Today there are 2 entrances available directly from Sepulveda Boulevard. The new plan has one entrance roadway with 3 additional turns and a merging with Century Boulevard traffic at Airport Boulevard, which is already a busy intersection. A better plan would be to provide access from Pershing Drive and an extension of Imperial Highway. That would increase the road capacity into the terminal area.

Response: The commenter's opinion of the proposed Project is noted. The description of the proposed roadway presented in the comment is not accurate. Access into the Central Terminal Area (CTA) from the north would be improved with the proposed roadway system. Currently, access to the CTA from the north is via the Sky Way exit from southbound Sepulveda Boulevard. As has been seen in the past, prior to the aviation activity downturn associated with the COVID-19 pandemic, traffic congestion within the CTA would back up onto Sky Way and would sometimes back up even farther extending onto southbound Sepulveda Boulevard. This would cause traffic gridlock at the intersection of Sepulveda Boulevard and Lincoln Boulevard, and substantially increase the amount of time it would take for drivers to get into the CTA.

The proposed Project includes a flyover ramp that is proposed to replace the Sky Way exit. With this flyover ramp, CTA-destined traffic from southbound Sepulveda Boulevard would be routed onto an elevated roadway system with improved flows into the CTA and much more vehicle storage/queuing capacity. This additional storage/queuing capacity would prevent congestion within the CTA from backing up onto southbound Sepulveda Boulevard. Such an improvement in CTA-destined traffic flows and provision of additional vehicle storage/queuing capacity would also occur for northbound traffic on Sepulveda Boulevard, relieving the congestion that occurs immediately north of the Sepulveda Tunnel.

The commenter states that the proposed roadway system would merge with Century Boulevard at Airport Boulevard. This statement is incorrect. The elevated roadway

system that is inbound to the CTA would merge with Century Boulevard just west of the future Jetway Boulevard, which is over one-half mile west of Airport Boulevard, and would only merge with the westbound lanes of Century Boulevard that cross over Sepulveda Boulevard that are entering the CTA.

The commenter proposes providing access to the CTA from Pershing Drive. This proposal is infeasible. Such access would traverse a major portion of the airfield operations area, including several aircraft taxiways, the Midfield Satellite Concourse facility, and the Tom Bradley International Terminal. These operations are located between Pershing Drive and the CTA.

The commenter states that LAX does not provide "realistic public transportation alternatives." This statement is incorrect. The LAX Landside Access Modernization Program has been approved and is under construction, and includes an Automated People Mover that, among other things, provides a direct connection between the CTA and regional transit. The proposed LAX Airfield and Terminal Modernization Project is designed to integrate with these improvements. Please see Section 2.4.3 of the Draft EIR.

ATMP-PC017-2

Comment: The construction period is going to be a tremendous mess. LAX is already ranked at the bottom of airport access among major US airports, and this plan will just add to the performance gap. I dread the construction start. This project will just make LA less livable and a more difficult place to do business.

Response: The comment will be included in the Final EIR for consideration by the decision-makers prior to taking any action on the LAX Airfield and Terminal Modernization Project. Analysis of impacts related to transportation, noise, and air quality associated with construction of the proposed Project is provided in Sections 4.8, 4.7.3, and 4.1.1 of the Draft EIR, respectively. Additionally, the Draft EIR includes multiple mitigation measures (including Construction Noise Control Plans, Construction Scheduling, and Construction Mitigation Oversight) to minimize construction impacts. (See, e.g., Section 4.7.3 of the Draft EIR.)

It should also be noted that the proposed Terminal 9 Automated People Mover (APM) station would improve transit access to LAX and the proposed roadway improvements are designed to improve vehicular access to LAX.

ATMP-PC018 Lall, Jessica Central City Association of Los Angeles 2/9/2021

ATMP-PC018-1

Comment: Established in 1924, Central City Association (CCA) is a membership organization representing over 300 businesses, non-profit organizations and trade associations that are committed to advancing policies and projects that enhance Downtown Los Angeles'

vibrancy and increase investment in the region. CCA supports projects that improve Los Angeles' regional economic infrastructure and global competitiveness, and we're pleased to offer our support for the LAX Airfield and Terminal Modernization Program (ATMP) with that in mind.

LAX is our region's gateway to the world and is a vital link between our city and the global economy as millions of passengers and cargo tons pass through LAX each year. It is also the first experience that many visitors to Los Angeles have when they arrive and their last impression when they leave. It is paramount to ensure that LAX is a welcoming and highly efficient and functional airport. The ATMP is an important project to achieve that goal.

The ATMP will improve airfield operations and aircraft movement translating to less delays and greater safety. Terminal enhancements will also provide better passenger experience with more seating and concessions than the existing remote terminals, and greater convenience overall, especially with seamless connections between international and domestic flights. Importantly, the project's benefits extend beyond the site itself by promoting new local jobs and business opportunities during construction and operation. The ATMP also fosters a better environment for the surrounding community with reduced congestion and emissions and connections to the Automated People Mover.

CCA is a strong advocate for investing in infrastructure that drives the long-term economic health and sustainability of our region. We are excited for the ATMP and look forward to its implementation. Thank you for your consideration.

Response: This comment is noted. The comment will be included in the Final EIR for consideration by the decision-makers prior to taking any action on the LAX Airfield and Terminal Modernization Project. No further response is required because the comment does not raise any significant environmental issues. (See Public Resources Code Section 21091(d); State CEQA Guidelines Sections 15088(c), 15204(a).)

ATMP-PC019	**Peters, Lori and David Anderson**	**LAX Airline Airport Affairs Committee**	**2/24/2021**

ATMP-PC019-1

Comment: The Airline Liaison Office (ALO) and the AAAC have reviewed the draft ATMP EIR and would like to take this opportunity to provide feedback for your consideration. The LAX airline community appreciates the thoroughness and detail of the report shared and applauds the environmental efforts.

A concern that has surfaced which we would like to bring to your attention is related to loss of "space" that is currently used by the airlines and for which there is no apparent plan to replace. As identified on Table 2-4, the space concerns include:

1. AA and UA aircraft parking (T9 Site) (page 2-65)

2. LAW A operations aircraft parking (T9 Site) (page 2-66)
3. Impact on LAXFUEL current and future potential needs (page 2-63)
4. A portion of AA cargo staging space (Twy C Extension) (page 2-65)

Response: Please see Responses to Comments ATMP-PC019-2 through ATMP-PC019-4 below.

The comments from the Airline Liaison Office and the AAAC will be included in the Final EIR for consideration by the decision-makers prior to taking any action on the LAX Airfield and Terminal Modernization Project.

ATMP-PC019-2

Comment: As you may be aware, sufficient aircraft parking space has been a challenge at LAX for an extended period of time and the proposal to reduce space has the potential to limit future activity. As airlines plan their network flight schedules, particularly those who operate in either a hub-spoke structure and/or with slot/curfew restrictions, access to RON or extended aircraft rest space can be a critical factor when deciding what flights may or may not be offered at a particular destination. As plans are further refined, the AAAC strongly encourages LAWA to seriously consider alternate uses of space to preserve and create aircraft parking areas.

Response: As discussed on page 2-19 in Section 2.4 of the Draft EIR, the proposed airfield elements are currently at a preliminary design level of planning, which is appropriate at this stage for evaluating the potential environmental impacts of the proposed Project. Detailed information on remote aircraft parking would be developed during Project-specific design. The commenter's concerns about remote aircraft parking are not limited to changes associated with the proposed Project and, as noted in Response to Comment ATMP-PC019-1, will be included in the Final EIR for consideration by the decision-makers prior to taking any action on the LAX Airfield and Terminal Modernization Project. LAWA will address the need for remote aircraft parking as part of its broader airport planning efforts.

ATMP-PC019-3

Comment: Regarding space for LAXFUEL, the airline community would like to ensure that sufficient land, facilities, and other infrastructure is available for operations at time of construction as well as capacity for any forecasted future needs. Has there been an assessment of what needs might be associated with operational activity in future years?

Response: Please see Responses to Comments ATMP-PC020-1 and ATMP-PC020-2 regarding LAXFUEL facilities and operations.

ATMP-PC019-4

Comment: Finally, volume at the American Airlines cargo staging area often exceeds capacity today. Further reduction in space would place limitations on how much cargo could be processed through the facility. Have alternatives been considered to retain an equivalent amount of space for cargo staging?

Response: This comment is similar to comment ATMP-PC037-10. Please see Response to Comment ATMP-PC037-10 regarding cargo staging space.

ATMP-PC019-5

Comment: The LAX airlines look forward to speaking further with LAWA regarding possible alternatives to preserve critical operational space while moving forward with the ambitious vision for LAX.

Response: This comment is noted. The comment will be included in the Final EIR for consideration by the decision-makers prior to taking any action on the LAX Airfield and Terminal Modernization Project.

ATMP-PC020 Gaytan, Enrique LAXFUEL Corporation 3/5/2021

ATMP-PC020-1

Comment: The current Draft ATMP EIR does not include the expansion of the current on-airport fuel facility at LAX. LAXFUEL requires additional on-airport fuel storage to allow for both Concourse 0 and Terminal 9 to be supported for future operations.

Response: As summarized in Section 2.3.1.2.2 of the Draft EIR and further documented in Appendix B.1 of the Draft EIR, projected aircraft activity levels in 2028 would be the same with and without the proposed Project; therefore, any increase in aviation fuel demand that would require the expansion of the current on-airport fuel facility would occur with or without the proposed Project. Please see Topical Response TR-ATMP-G-1 for more information regarding the aviation demand forecast and future aviation activity at LAX. LAWA will assess future fuel capacity needs at LAX as part of its ongoing business practices, including fuel demand associated with Concourse 0 and Terminal 9, and will work with LAXFUEL to ensure that sufficient facilities are available to meet future needs.

ATMP-PC020-2

Comment: The planned expansion of Taxiway D displaces a portion of the existing fuel facility lease hold which is necessary to maintain current operations at the airport. These displaced facilities include a refueler loading facility and hydrant cart test stand as well as equipment laydown for ongoing maintenance and construction activities. LAXFUEL will require additional space to construct a replacement refueler loading facility on the

Airport Operations Area (AOA) and hydrant cart test stand for testing and calibrating refueling equipment.

Response: As stated in Table 2-4 in Chapter 2 of the Draft EIR, the enabling projects associated with the LAXFUEL facility (Map ID # 6) would be relocated near their current locations. Specifically, "[a] truck loading rack at the LAXFUEL facility would be removed and relocated nearby." LAWA has been working with LAXFUEL to identify an on-airport site within reasonable proximity for the refueler facility, hydrant cart test stand, and equipment laydown area in the event the proposed Project is approved and implemented. If the Project is approved, LAWA would continue to work with LAXFUEL to provide accommodations for relocating the existing infrastructure. This relocation would occur so that there would not be any gap in service.

ATMP-PC021 Miller, Dennis Neighborhood Council of Westchester Playa (NCWP) Residential District 11 11/29/2020

ATMP-PC021-1

Comment: I read the the "LAX Airfield and Terminal Modernization Project Draft EIR"

I keep coming back to the traffic, are they looking at the traffic around the airport? I see congestion on neighborhood streets but how do you report the problems, and who do you report the problem when the city is trying to make street lanes, one or two lanes.

·Reduces traffic congestion on neighborhood streets
·Promotes sustainable practices - minimum LEED Silver Certification for new buildings
·Reduces wait times on airfield; reduces aircraft idling, decreasing emissions
·Provides an additional connection to the Automated People Mover train, which will link to regional mass transit.

Response: Please see Topical Response TR-ATMP-T-1 regarding the assessment of transportation effects associated with the LAX Airfield and Terminal Modernization Project that are not subject to CEQA, which was conducted in accordance with the City of Los Angeles Transportation Assessment Guidelines. As indicated therein, traffic congestion is no longer used as a basis for determining significant impacts for land use projects and plans in California.

Regarding traffic congestion on city streets, any issues or problems can be reported directly to the Los Angeles Department of Transportation (LADOT) at 828 Sawtelle Blvd., RM 108, Los Angeles, CA 90025, e-mail: ladot.westerndistrict@lacity.org. Or file a service request at LADOT Website, ladot.lacity.org.

It is unclear how the comment "Reduces wait times on airfield; reduces aircraft idling, decreasing emissions" pertains to traffic or is otherwise a comment on the Draft EIR. Therefore, a response cannot be provided.

ATMP-PC021-2

Comment: Noise: I hear the airplanes from my neighborhood, most of the noise is airplanes taking off noise.

Response: The Draft EIR discusses existing baseline (2018) aircraft noise exposure in Section 4.7.1.3.2.1; Figure 4.7.1-6 in that section delineates the 65, 70, and 75 Community Noise Equivalent Level (CNEL) aircraft noise contours for existing baseline conditions and also shows the underlying land use types. As discussed in Section 4.7.1.3.2.1, approximately 95 percent of departures at LAX are to the west (includes both west flow and over-ocean operations). When in west flow, aircraft arrive from the east (traveling to the west) and depart from the airport in a westerly direction. Therefore, in west flow, takeoffs are routed to the west of the airport, with the climb out portion of the takeoff occurring mostly over the ocean. For most aircraft, the climb phase, which utilizes higher engine thrust, is the noisiest phase of flight. Furthermore, during the late night and early morning hours (midnight to 6:30 a.m.), over-ocean procedures are in place that route both arrivals and departures over the ocean in order to reduce aircraft noise in populated areas. These procedures have been in place since the early 1970s. Due to these operating procedures, aircraft noise levels are much higher west of the airport over the ocean than over the populated areas to the north, south, and east of the airport.

ATMP-PC022 Martin, Jane SEIU USWW 11/30/2020

ATMP-PC022-1

Comment: here is the question I would like to submit:

What plans does LAWA have to work with the city to convene a community benefits process to mitigate impact on workers and surrounding neighborhoods including housing, displacement, traffic, public transit, good jobs and the environmental health impacts of such a large expansion?

Response: The potential for the proposed Project to result in impacts to housing was evaluated in the Initial Study, which is included in Appendix A of the Draft EIR. As concluded in the Initial Study, the proposed Project would not displace existing housing or people. The proposed Project would have no impacts on housing and no mitigation would be necessary. Impacts to transportation, and mitigation measures to address those impacts, are addressed in Section 4.8 of the Draft EIR. Impacts to public transit are also addressed in Section 4.8 of the Draft EIR. As evaluated in that section, impacts on public transit would be less than significant and no mitigation would be necessary. With respect to effects on traffic, please see Topical Response TR-ATMP-T-1. Impacts to human health are addressed in Section 4.1.2 of the Draft EIR. As evaluated in that section, impacts on human health would be less than significant and no mitigation would be necessary. With respect to workers, the proposed Project would result in a daily total of approximately 4,700 new long-term employees associated with the operation of Concourse 0 and Terminal 9 and thousands of construction jobs between 2022 and 2028.

LAWA has a long-standing history of working with the community and other stakeholders to address issues related to development at LAX. With respect to the proposed Project, LAWA has met with community and labor organizations to discuss their concerns and would continue to work with these stakeholders during Project design and implementation.

ATMP-PC023	**Carstens, Douglas P.**	**Chatten-Brown, Carstens & Minteer LLP, on behalf of Alliance for a Regional Solution to Airport Congestion**	**1/11/2021**

ATMP-PC023-1

Comment: In the informal discussions of the Alliance for a Regional Solution to Airport Congestion (ARSAC) with you to resolve differences with our 2016 Memorandum of Understanding (MOU) and this group of projects, ARSAC is learning details of the ATMP project that impact our review of the draft environmental impact report (EIR).

To complete our mutual efforts to resolve issues and to provide appropriate comments we are requesting a 60-day extension to the comment period for the draft EIR.

We look forward to hearing from you at your earliest convenience.

Response: On October 29, 2020, LAWA published the Draft EIR for the proposed LAX Airfield and Terminal Modernization Project. In accordance with the State CEQA Guidelines, the Draft EIR was originally circulated for public review for 47 days (two days more than the required minimum 45 days), with the review period originally closing on December 14, 2020. A virtual open house was launched on November 25, 2020 that provided detailed information about the proposed LAX Airfield and Terminal Modernization Project and the Draft EIR analysis. LAWA also held a virtual public meeting on December 1, 2020 that provided stakeholders with a presentation on the proposed Project and the Draft EIR analysis, as well as an opportunity for questions and answers. The comment period for the Draft EIR was extended twice due to requests from the community and neighboring jurisdictions, including ARSAC. It was initially extended by 60 days to February 12, 2021, and then extended again for an additional 31 days, for a total comment period of 138 days, with the comment period closing on March 15, 2021. LAWA determined that the two extensions of the comment review period, which resulted in a comment period that was more than triple the review time required by CEQA, coupled with the virtual open house and virtual public meeting described above, provided adequate time and information for public review of the Draft EIR.

ATMP-PC024 Landreth, Lloyd W. Landreth Law Firm PLC, on behalf of LAWTFC 3/12/2021

ATMP-PC024-1

Comment: World Airports (LAWA), is the International Airline Fuel Consortium tenant at Los Angeles International Airport (LAX). LAWTFC provides specialized passenger and cargo aircraft fueling services and equipment to its 42 member airlines and 17 non-member airlines at LAX. LAWTFC is the only fuel supply and provisioning source to this significant segment of all air traffic at LAX. Approximately one-half of the fuel volume supplied to all airlines using LAX is derived from the services of LAWTFC. Using pre-COVID statistics by way of example, in 2019 LAWTFC was responsible for supplying 3.2-million gallons of fuel per day, which accounted for 47% of the total annual fuel used by all aircraft at LAX.

LAWTFC has reviewed LAWA's publicly available documents related to the Airfield & Terminal Modernization Project (ATMP) and the associated Draft Environmental Impact Report (DEIR). More specifically, the focus of these comments by LAWTFC is on two portions of the ATMP, namely the Taxiway D project and the Concourse 0 & Terminal 9 fueling under the ATMP. Measurable harm to international passenger and cargo airline fueling services at LAX will result if the proposed ATMP Taxiway D project and Concourse 0 and Terminal 9 were to proceed as planned. There is no indication in the Draft EIR that LAWA considered the impacts of increased AOA traffic congestion, increased greenhouse gas emissions, increased potential for fueling-related spills, and impacts on flight schedules as a direct result of the projects defined in the DEIR. LAWTFC submits the following comments in the interest of working with LAWA toward appropriate mitigation.

Response: Although the proposed Project includes construction of Concourse 0 and Terminal 9, projected aircraft activity levels in 2028 are the same with and without the proposed Project; therefore, the increased demand for aviation fuel would occur with or without the proposed Project. Please see Topical Response TR-ATMP-G-1 for more information regarding the aviation demand forecast and future aviation activity at LAX.

The commenter asserts that the Draft EIR did not consider the potential impacts related to increased airport operations area (AOA) traffic congestion, increased greenhouse gas (GHG) emissions, the increased potential for fueling-related spills, and the impacts on flight schedules. The Draft EIR did, in fact, consider the impacts of changes to the AOA in Appendix B, increased GHG emissions in Section 4.4, increased potential for fueling-related spills in the Initial Study provided in Appendix A, and impacts on flight schedules in Appendix B.

Specifically, aircraft activity on the AOA and changes to flight schedules as a result of the projected growth and the airfield and terminal modifications associated with the proposed Project were accounted for in the airfield simulation modeling conducted for the Draft EIR (Appendix B.2). The simulation modeling served as the basis for the analysis of impacts related to aircraft activity, including the analysis of GHG emissions, which are fully evaluated in Section 4.4 of the Draft EIR. The operational GHG analysis also considered ground support equipment (GSE), ground vehicles, aircraft engines and auxiliary power units (APUs), and other sources.

Responses to the other comments in this letter are provided in Responses to Comments ATMP-PC024-2 through ATMP-PC024-6 below.

ATMP-PC024-2

Comment: DEIR Comments: Please Reference LAWTFC EXHIBIT

1. LAWTFC maintains and operates two 12-inch distribution fuel-supply lines and the West Remote Gates' hydrant fueling system they serve. The West Remote Gates are a critical boarding area for LAX during normal operations (pre-COVID) and have been utilized by LAWA during COVID to provide flexibility for enplanement of various passenger groups arriving and departing from LAX. The Taxiway D project, as planned, appears to eliminate the source of fuel to aircraft using the West Remote Gates by requiring abandonment of the two 12" distribution fuel-supply mains.[DEIR p. 2-20 §2.4.1.1; DEIR p. 2-38 §2.4.2.3]

Since LAWA plans for flights to continue to be served from the West Remote positions after the two 12" fuel lines are removed from service [DEIR p. 2-20 §2.4.1.1; DEIR p. 2-38 §2.4.2.3], the only source of fuel would be large-format 9,200-gallon (net volume) tanker trucks (refuelers). These trucks are not currently available to LAWA or LAWTFC, and must be purchased, custom built, and then supported with a suitable overnight parking area that must provide general spill containment that is not identified anywhere in the Enabling Projects outlined in the DEIR [DEIR pp. 2-61 to 2-75, §2.5.1].

These refuelers exceed 14,100 lbs. each and are powered by diesel engines because of their size, operating durations and other factors, including weight that increase pollutant emissions. In addition to the increased greenhouse gas emissions resulting from trucking fuel to the West Remote Gates, these refuelers will impose additional vehicle traffic burdens on the already-congested AOA vehicle roadways. Trucking fuel also represents a potential for fuel releases to the environment, which the transport of fuel via distribution mains and West Remote Gate hydrant fueling systems significantly reduces the risk of release and furthermore will not conform to the stated goal listed in Section 2.4.5 Sustainability, (DEIR p. 2-59) 'LAWA would incorporate sustainability features into the proposed Project'. Table 2-3 (DEIR p.2-60) states that 'Ground Support Equipment Operations' shall meet the goal to 'reduce pollutant emissions.'

Relevant West Remote Gates' statistics include: 18 parking positions that are all suited to ADG Group V aircraft (and one of the 18 was modified to suit Group VI as well). For 2019, the daily averages for aircraft flights served and fuel uplifted at the West Remotes were found from a review of fueling records and general operational averages that are available to LAWTFC and to LAWA. The total number of flights (aircraft) that took fuel at the West Remotes in 2019 was 4,255 according to the fueling operator Menzies Aviation. That equates to about 354 flights per month. Of these flights, the approximate percentages - by aircraft-family - were estimated at 1% for A380's = 3 per month, 4% for B74X = 14 per month, 70% for B77X = 248 per month, 9% for B787 = 32 per month and the remaining 16% were either A33X or A34X = 57 per month.

Menzies, the fuel system and into-plane operator, also notes that average fuel uplifts - by aircraft family - are well established for the West Remotes and the number of 9,200-gallon refueler deliveries per flight can be established thereby: A380 (average fuel-lift per flight = 46,000 gallons needing 5 refuelers); 74X (average lift per flight = 42,000 gallons needing 5 refuelers); 77X (average lift per flight = 30,000 gallons needing 4 refuelers); 787 (average lift per flight = 23,000 gallons needing 3 refuelers); A33X/A34X (average lift per flight = 23,000 gallons needing 3 refuelers).

Since the DEIR does not establish where the north refueler loading rack will be moved to during or before Taxiway D is extended within the Enabling Projects outlined in the DEIR [DEIR p. 2-63], it is not possible to estimate the miles the refuelers (tankers) will travel on a monthly basis, but the average number of refueler trips per month is approximately 1,344 per month, requiring an average of 45 refueler trips per day. Depending on the distance this could require from 5 to 7 new diesel refuelers traveling non-stop over already-congested AOA vehicle roadways.

Despite the direct and measurable environmental, social and economic impacts, LAWTFC has never been contacted to discuss relocating, altering, maintaining or replacing the two distribution mains and the hydrant system. LAWTFC should have been consulted to avoid these impacts, but instead, the Schedule published in Fig 2-28 on p. 2-79 of the DEIR indicates that enabling projects do not start earlier than the westward extension of Taxiway D, so it is clear that the ATMP planned work and schedule related to Taxiway D must be revised to preserve the two distribution mains in their current location, or to relocate the two distribution mains in a planned manner which allows continued use of the West Remote Gate hydrant system both during and after ATMP construction projects to serve the hard-stand parking identified by Enabling Projects outlined in the DEIR [DEIR p. 2-63, Item 2, indicating that 9 positions for fueling will remain in use by redirected flights].

Response: The commenter states that the proposed Taxiway D extension would eliminate the source of fuel to aircraft using the West Remote Gates by requiring the abandonment of the 12-inch distribution mains that provide fuel to these gates. LAWA does not intend to abandon the 12-inch jet fuel supply mains and would endeavor to protect these lines in place as part of the Taxiway D westerly extension. Therefore, it is not expected that there would be a need for the large-format tankers identified by the commenter. As a result, there would not be any impacts associated with providing fuel to the remaining West Remote Gates that are identified by the commenter, including GHG emissions from tanker trucks and potential fuel releases to the environment. LAWA would work with LAWTFC to discuss the proposed plan and methods for protecting the distribution lines in place and ensuring fuel supply to the remaining West Remote Gates.

Please see Response to Comment ATMP-PC020-2 regarding the relocation of the refueler loading rack. As noted in that response, LAWA is working with LAXFUEL to identify a nearby relocation site in the event the proposed Project is approved and implemented. Therefore, the mileage and trips associated with fueling trucks would not be materially different from existing conditions.

The commenter states that nine gate positions will remain in use. Please see Topical Response TR-ATMP-G-2 regarding the status of the West Remote Gates following implementation of the proposed Project. As described in the topical response, and in Section 2.4.2.3 of the Draft EIR, although Taxiway D westerly extension would only require removal of nine West Remote Gates, LAWA would decommission an additional six West Remote Gates as part of the proposed Project. With implementation of the proposed Project, 15 of the existing 18 West Remote Gates would no longer be used for regularly-scheduled commercial flights. The three remaining West Remote Gates would remain in use.

ATMP-PC024-3

Comment: 2. According to the EIR documents for the ATMP, elimination of the fueling system at the West Remote gates will occur very early in the construction of the proposed Taxiway D (T/W D) program. [DEIR p. 2-38 §2.4.2.3] If LAWA had anticipated using the proposed Concourse 0 and Terminal 9 as locations to move the West Remote Gates flights, the timing will not work. Because LAWA cannot commit to airlines that rely on the West Remote Gates that LAWA has alternative boarding area and fueling locations, this gap in use of the West Remote Gates would have the direct result of significant congestion in the existing Terminal areas, increased refueler truck use and increased passenger vehicle use, all causing increased greenhouse gas emissions due to vehicular/truck traffic. The ATMP work related to Taxiway D and the West Remote Gates has the irreparable outcome of preventing a safe and environmentally-sound supply of fuel to the West Remote Gates and must be modified to address these impacts.

Response: Please see Response to Comment ATMP-PC024-2 regarding the fueling system that supplies the West Remote Gates. As noted in that response, the 12-inch jet fuel supply mains would not be required to be abandoned; rather, those pipelines are planned to be protected in place as part of the Taxiway D westerly extension. LAWA would work with LAWTFC to discuss the proposed plan and methods for protecting the distribution lines in place and ensuring fuel supply to the remaining West Remote Gates. Because the pipeline would remain in place, new refueling trucks would not be needed to supply fuel to the remaining West Remote Gates.

ATMP-PC024-4

Comment: 3. The LAWTFC fuel system manifold for the West Remote Gates hydrant system is located in the northwest corner of the LAXFUEL 'north' loading rack facility. Based on LAWA's ATMP project documents, the proposed Taxiway D extension will traverse through this area. A new single 12-inch fuel main is not likely to be sufficient during peak fueling periods, so a single 14-inch fuel distribution main could be extended to the existing hydrant fueling mains at the West Remotes from the LAXFUEL leasehold area. The potential route could be along the path of the planned service drive south of Taxiway D. The DEIR must address the impacts within the schedule on page 2-79, Figure 2-28 to adequately address LAWTFC's fuel manifold, and the north refueler loading rack facility must also be relocated in an area yet to be identified by the DEIR [DEIR p. 2-63, Table 2-

4, item 6]. Adding more refuelers to serve the West Remotes, while reducing truck loading facilities simultaneously will lead to increased flight delays and air emissions along with negative impacts to passenger experience. Relocating the north loading racks anywhere east or south of the existing north loading racks' current location cannot be considered since these areas will negatively impact the needs of LAXFUEL as identified in their comments and LAWTFC's operations area used for charging the electric carts, maintenance and operations, and over-night parking of a limited number of refuelers.

Response: Please see Response to Comment ATMP-PC024-2 regarding the fuel lines serving the West Remote Gates and Response to Comment ATMP-PC020-2 regarding the relocation of the refueler loading rack.

ATMP-PC024-5

Comment: 4. The DEIR asserts that LAWA intends to replace 15 of the 18 West Remote Gates with new contact gates located at the proposed Concourse 0 and Terminal 9. [DEIR p. 2-20 §2.4.1.1; DEIR p. 2-38 §2.4.2.3] However, LAWTFC notes that 9 positions will remain and these have hydrant fueling capability. How does LAWA intend to fuel these remaining 9 West Remote positions (including the 3 Gated positions) into the future? See [DEIR p. 2-38 §2.4.2.3] If these remaining positions are re-purposed for itinerant flights and other aircraft as the DEIR suggests, what mitigation measures has LAWA established to refuel these aircraft? `Delivery of fuel by refueler trucks is one option, but as noted in prior comments, this option requires an accessible truck loading area, increases AOA vehicle traffic, and causes more greenhouse gas emissions.

Response: Please see Response to Comment ATMP-PC024-2 regarding the fuel lines serving the West Remote Gates, as well as the number of gates that would be retained at the West Remote Gates. As noted in that response, LAWA plans to protect the 12-inch jet fuel supply mains in place as part of the Taxiway D westerly extension project.

ATMP-PC024-6

Comment: 5. In support of LAWA's stated goal on Table 2-3 to 'reduce vehicle emissions' listed in Section 2.4.5 Sustainability, page 2-59, 'LAWA would incorporate sustainability features into the proposed Project', LAWTFC operates (32) electric hydrant carts (the world's largest fleet of electric hydrant fueling carts) that move fuel from the hydrant fueling system into the airplane. Both Concourse 0 and Terminal 9 are too far from the existing LAWTFC leasehold (see LAWTFC EXHIBIT 1) to allow the LAWTFC electric carts to travel to and from the new gate areas and effectively fuel more than just a few flights at the new buildings before they will be forced to recharge. The DEIR does not describe any means or methods for charging carts at Concourse 0 and Terminal 9 within the planning drawings provided within Section 2 of the DEIR and does not list charging stations for these critical GSE units under the Table 2-3 on DEIR p. 2-60 within the Sustainability Feature 'Ground Support Equipment Operations.' Fueling of airplanes at Concourse 0 and Terminal 9 cannot occur without provisions for cart charging areas of substantial size. Unless electric carts are adequately planned for, gasoline or diesel driven carts will

have to serve these proposed replacement gates, significantly increasing greenhouse gas emissions.

Response: Regarding the commenter's statement pertaining to the need for cart charging areas at Concourse 0 and Terminal 9, the LAX Airfield and Terminal Modernization Project is currently at a preliminary design level of planning sufficient for evaluating the potential environmental impacts. Detailed information regarding electric ground support equipment charging facilities, including electric cart charging locations and fueling cart operations, would be developed during Project-specific design. LAWA would coordinate with LAWTFC during the design process regarding facilities for electric hydrant carts. Please see Response to Comment ATMP-PC020-1 regarding any increase in aviation fuel demand.

ATMP-PC025 Gerez, Paula Neighborhood Council of Westchester Playa (NCWP) 3/13/2021

ATMP-PC025-1

Comment: Dear Ms. Quintanilla,
The Neighborhood Council of Westchester Playa has reviewed the DEIR for the Airfield and Terminal Modernization Project and has concluded that the project as currently presented poses grave adverse strain to the community and our quality of life. The combination of two distinct projects – Airfield Safety Modernization and the Terminal Expansion of adding two new terminals 0 and 9 – has given the incorrect impression that the entire project is about modernization. The project should be broken apart into two distinct projects- Airfield Modernization and Adding New Gates via Terminal Expansion. While we are supportive of the Airfield Modernization portion of the project, we are not in favor of Terminal Expansion. As such, the NCWP will not support the project as currently configured.

The various projects presented should be properly bifurcated and reintroduced individually for closer inspection of individual environmental and traffic impact data, consideration and to allow for oversight as "parts of the whole".

Response: As described in Section 2.4 of the Draft EIR, the main elements of the proposed LAX Airfield and Terminal Modernization Project are interrelated. As indicated in the description of the airfield elements, presented in Section 2.4.1, the westerly extension of Taxiway D would require the removal of nine existing West Remote Gates. The Taxiway D extension cannot occur unless these nine West Remote Gates are removed. LAWA also proposes, as part of the proposed Project, to decommission an additional six West Remote Gates. The removal of those 15 gates from regularly scheduled commercial service would be replaced by the development of new gates at Concourse 0 and Terminal 9, which are described in Section 2.4.2.

As indicated in Section 2.4.3, regarding the proposed landside improvements, the development of Terminal 9 would be coordinated with the development of the proposed roadway system, to provide curbside access at the terminal, as well as a new Automated

People Mover station adjacent to the terminal. The environmental analyses address the overall impacts of the main elements combined. To bifurcate the proposed Project in the manner suggested by the commenter would not provide a comprehensive integrated analysis of Project impacts. Because CEQA requires the EIR to address the whole of the project under consideration, the commenter's proposal would be contrary to the intent and requirements of CEQA. (See State CEQA Guidelines, Section 15378.)

The EIR includes analyses of alternatives that are responsive to this comment. Alternative 2 (Draft EIR Section 5.4.2.2) includes development of Concourse 0, but not Terminal 9. Alternative 3 (Draft EIR Section 5.4.2.3) includes development of Terminal 9, but not Concourse 0. LAWA also considered an "Airfield Improvements Only" alternative, but rejected this alternative from detailed analysis due to the removal of the nine West Remote Gates. (See Draft EIR Section 5.4.1.4.)

ATMP-PC025-2

Comment: In addition, this DEIR report exposes a potential serious overreach by LAWA. We have reached the point in which LAWA could be violating the "Spirit" of existing non-expansion agreements currently in place. Unfortunately, the bottom line is the DEIR reflects capacity and gate increases openly.

Response: The comment is noted and will be included in the Final EIR for consideration by the decision-makers prior to taking any action on the LAX Airfield and Terminal Modernization Project. LAWA is committed to honoring its agreements. As noted in Chapter 2 and Appendix B.1 of the Draft EIR, future activity in 2028 is projected to be the same with or without implementation of the proposed Project. Please also see Topical Response TR-ATMP-G-1 regarding the forecast of future aviation and passenger activity at LAX.

ATMP-PC025-3

Comment: Our concerns are centered on the following areas – Air Quality; Greenhouse Gas Emissions; Noise; and Transportation Congestion. Proposed mitigation is not enough to overcome the determination of "Significant and Unavoidable" impacts to several key environmental measurements caused by the project. Environmental concern for Air Quality, Greenhouse Gas, Aircraft Noise and Transportation will be significant even after mitigation. The community will be exposed to these adverse impacts every day. For more detailed information, please refer to DEIR pages 1-24 and 1-25. We believe that most of the Air Quality increases will exceed guidelines from the SCAQMD.

Response: Impacts associated with air quality, greenhouse gas emissions, noise, and transportation are evaluated in Sections 4.1.1, 4.4, 4.7, and 4.8 of the Draft EIR, respectively. As noted by the commenter, even with the implementation of feasible mitigation measures, impacts to some of these resources would be significant and unavoidable. As required by Section 15093 of the State CEQA Guidelines, LAWA will prepare a Statement of Overriding Considerations that addresses the specific economic, legal, social,

technological, or other benefits of the proposed Project that outweigh the Project's unavoidable adverse environmental effects. In accordance with Section 15093(c), the Statement of Overriding Consideration will be included in the record of the Project approval and will be mentioned in the Notice of Determination. The Statement of Overriding Considerations is not required to be published concurrently with publication of a Draft EIR.

ATMP-PC025-4

Comment: Also, the new CEQA VMT (Vehicle Miles Traveled) calculations show significant increases that will directly increase traffic congestion around Westchester Playa. Total passenger VMT for 2019 was 6,581,811 and the 2028 forecast is 8,709,995 - a 32% increase in miles traveled. This translates to total airport daily trip generation to and from the airport will go from 316,128 in 2019 to 407,942 in 2028- a 29% increase in daily trips. With no mitigation, this will create significant traffic in our neighborhoods. And this is after LAMP will have been operational for 5 years.

Response: The commenter restates data from Tables 4.8-9, 4.8-10, 4.8-13, and 4.8-14 on the Future (2028) with Proposed Project forecasts of VMT and vehicle trips related to growth in activities at LAX. Please note that the commenter made a typographical error; total passenger VMT under the proposed Project in 2028 is 8,708,995 not 8,709,995 as indicated in the comment (refer to Tables 4.8-10 and 4.8-13 in the Draft EIR). As stated in Section 6.3.2 of the Draft EIR, the forecast growth in passenger activity and aircraft operations by 2028 will occur with or without the proposed Project. The increased employment at LAX and the reconfiguration of internal access roads is largely what leads to estimated growth in VMT and vehicle trips in the Future (2028) with proposed Project scenario. The commenter asserts that without mitigation the growth in traffic will affect surrounding neighborhoods. The proposed Project includes an extensive program of mitigation measures intended to reduce vehicle trips and reduce VMT, which is described in Section 4.8.5.2.2 on pages 4.8-52 through 4.8-57 of the Draft EIR.

ATMP-PC025-5

Comment: Our other concerns are –

- MAP projections show a 30% increase in passenger count from 84.56 M in 2017 to 110.8M in 2028. Further, annual aircraft operations will increase from 715,000 in FY2018 to 800,000 in FY2028.

Response: The passenger levels and annual aircraft operations data presented in the comment accurately reflects information presented in the Draft EIR (i.e., 2017 passenger level indicated in Table 2-1 of the Draft EIR and 2028 passenger levels, 2018 aircraft operations, and 2028 aircraft operations indicated Section 4 of Appendix B.1 of the Draft EIR). The commenter's concern regarding these increases in future passenger activity and annual aircraft operations at LAX will be included in the Final EIR for consideration

by the decision-makers prior to taking any action on the LAX Airfield and Terminal Modernization Project.

ATMP-PC025-6

Comment: -The Midfield Satellite Concourse North added 12 north gates and has yet to be put into service. An additional 8 south gates will be constructed in the next few years at the already approved Midfield Satellite Concourse South. Further, it appears that the MSC EIR already took credit for a reduction in Western concourse gates (see MSC EIR). Therefore, the AMTP DEIR should be evaluated as a gate increase of 18-27 new gates.

Response: The commenter is incorrect that LAWA already took credit for a reduction in West Remote Gates (WRGs). Please see Topical Response TR-ATMP-G-2 for a discussion of reasons why decommissioning 15 of the WRGs as part of the proposed Project was correctly represented in the Draft EIR. Please also see the topical response for a discussion of the gates at MSC, including gates associated with the MSC North Project, now known as the West Gates at Tom Bradley International Terminal, and gates associated with Phase 2 of the MSC Program, commonly referred to as the MSC South Project.

ATMP-PC025-7

Comment: - Specific Objectives of the Project cover Airfield improvement, Terminal improvements, Roadway System Improvements and Additional Objectives but fails to cover any specific improvements to our community which will bear the brunt of 26.24 M additional passengers and a significant 91,814 additional increase airport trips.

- No increase in Public Services.
- No specific improvements to traffic intersections within the community.
- No penalties/fines if proposed mitigation does not reduce negative environmental impacts

Response: The commenter does not specify which public services would be adversely affected by the proposed Project. Potential impacts of the proposed Project with respect to public services were evaluated in the Initial Study, which is included in Appendix A of the Draft EIR. As concluded in the Initial Study, impacts to public services would be less than significant. With respect to improvements to "traffic" intersections, please see Topical Response TR-ATMP-T-1. As discussed in the topical response, based on State and local requirements, intersection level of service, congestion, and delay impacts are no longer considered impacts on the environment and, therefore, are not addressed in the Draft EIR. However, the Los Angeles Department of Transportation (LADOT) Transportation Assessment Guidelines include a separate set of guidelines for evaluating transportation impacts outside of the CEQA process, including intersection operations. In accordance with these guidelines, a Non-CEQA Transportation Assessment was completed for the proposed Project. The Non-CEQA Transportation Assessment Report is available at https://www.lawa.org/atmp/documents; however, it does not pertain to the

environmental impacts of the proposed Project and is entirely separate from the EIR for the proposed Project. With respect to the comment that no penalties or fines are included in the Draft EIR if proposed mitigation does not reduce environmental impacts, Section 21159(a)(2) of CEQA and Section 15097(a) of the State CEQA Guidelines require a lead agency to identify feasible mitigation measures and to monitor and report on the implementation of those measures. LAWA will prepare and implement a Mitigation Monitoring and Reporting Program in accordance with CEQA.

ATMP-PC025-8

Comment: We believe that a CEQA EIR should not be based on providing the minimum mitigation needed for approval. But should be a forward-looking document on how "best" to balance the positive integration of a project into a community. And as such, here are items that we feel need to be added for us to re-consider our decision –

- Split the proposed project into two separate projects with separate EIR analysis for each project.

Response: The content of this comment is substantively the same as comment ATMP-PC025-1; please refer to Response to Comment ATMP-PC025-1.

ATMP-PC025-9

Comment: - VMT forecasts need to be monitored yearly with penalties assessed for not meeting forecast reductions. The penalties would go directly to mitigating traffic problems in the Westchester Playa community.

Response: Please see Topical Response TR-ATMP-T-2 regarding VMT mitigation measures and monitoring for the LAX Airfield and Terminal Modernization Project. The topical response discusses the mitigation monitoring requirements for transportation-related mitigation for the proposed Project.

The proposed Project would implement a VMT monitoring program to document and ascertain the effectiveness of the mitigation measures once implemented. Although it is indicated on page 4.8-57 of the Draft EIR that the basis for determining whether the mitigation requirement has been achieved would be based on having met the VMT per employee performance goal for three consecutive years, LAWA has proposed to increase that mitigation requirement to meeting the performance goal for five consecutive years (Please see Chapter F3, Corrections and Clarifications to the Draft EIR), which would further demonstrative the effectiveness of the selected VMT reduction strategies. LAWA has revised the Draft EIR to extend this monitoring in consultation with City of Los Angeles, Department of Transportation. Please refer to Response to Comment ATMP-AL009-11, Topical Response TR-ATMP-T-2, and Chapter F3, Corrections and Clarifications to the Draft EIR).

Regarding the suggestion to assess penalties for not meeting the forecast reductions, with the penalties going directly to mitigating traffic problems in the Westchester-Playa community, there is no evidence that directing fines and penalties to the Westchester Playa community would reduce airport-related VMT, consequently, this proposal would not be an effective means of achieving compliance with applicable VMT thresholds. The benefits of the proposed VMT reduction strategies are largely areawide and regional in nature and cannot be viewed in terms of a specific community. The commenter's proposal to use penalty funds to address local traffic problems focuses instead on congestion and delay, which are no longer CEQA issues; please see Topical Response TR-ATMP-T-1. It is instead appropriate to monitor the effectiveness of the VMT Reduction Program, and use available resources to adjust and expand that program as necessary, rather than to direct resources to resolve traffic congestion at a particular location.

ATMP-PC025-10

Comment: - Specific improvements to various streets and intersections -Sepulveda and Lincoln; Airport Boulevard between Arbor Vitae and La Tijera Boulevard; Aviation Boulevard between 111th Street and Century Boulevard; Aviation Boulevard between Arbor Vitae and La Cienega.

Response: The commenter requests the proposed Project be expanded to include, either as project elements or as mitigation measures, "[s]pecific improvements to various streets and intersections" and then lists five streets. No specific improvements are suggested in the comment and, thus, no direct response is possible. As discussed on page 4.8-1 in the introduction to the Transportation section of the Draft EIR, changes in State law mandate the use of VMT rather than delay or level of service (LOS) as the basis for determining the significance of transportation impacts. No significant impacts were identified at the streets and intersections listed in the comment. Notwithstanding, LAWA has completed a non-CEQA operational traffic analysis outside of the Draft EIR and, in consultation with LADOT, committed to funding certain improvements to signalized intersections on Sepulveda Boulevard between Imperial Highway and Manchester Boulevard. It should also be noted that installation of traffic monitoring cameras at the intersection of Lincoln Boulevard and Sepulveda Boulevard is included as part of the LAX Landside Access Modernization Program and LAWA has agreed, in coordination with LADOT, to expedite the installation of the system at that intersection.

ATMP-PC025-11

Comment: - Direct new roadways to the ITF-West to increase usage of LAMP and avoid the proposed left turn back up on Sepulveda

Response: LAWA has considered potential design options for the proposed Project's roadway system that would provide a direct connection from southbound Sepulveda Boulevard to the Intermodal Transportation Facility (ITF)-West, as suggested in the comment. In order to provide such a connection without utilizing the intersection of Sepulveda Boulevard and 96th Street, it would need to be a flyover ramp across Sepulveda

Boulevard similar to the ramp that is currently proposed, but shifted northward. The currently proposed flyover ramp from southbound Sepulveda Boulevard turns eastward and crosses over Sepulveda Boulevard at approximately 98th Street. The reason for that crossing location is that it allows for the above-grade portions of the ramp to stay outside of the Runway Protection Zone (RPZ) of Runway 6R-24L. An RPZ is a safety area at each end of a runway where the development of elevated structures can pose a potential hazard to arriving or departing aircraft and such development is to be avoided. The relationship between the RPZ for Runway 6R-24L and the proposed roadway system is shown in Figure 2-17 of the Draft EIR. All of the proposed roadway system improvements located within the RPZ are at-grade with no elevated structures within that area. The proposed flyover ramp from southbound Sepulveda Boulevard is at-grade within the RPZ and starts to rise above grade immediately south of the RPZ and continues to climb up to where it turns eastward for the crossing of Sepulveda Boulevard, which, as noted earlier, is around 98th Street. Should the location of the flyover ramp be shifted northward in order for the crossing to occur around 96th Street for a potential connection to the ITF-West, that would place the elevated structure well within the RPZ.

ATMP-PC025-12

Comment: Guarantee adoption and funding for LADOT non-CEQA traffic improvement and reduction recommendations from the upcoming report being analyzed based on DEIR traffic data.

Response: As discussed in Topical Response TR-ATMP-T-1, the Non-CEQA Transportation Assessment completed for the LAX Airfield and Terminal Modernization Project is separate from, and outside the scope of, the Draft EIR. The commenter's request that LAWA adopt and fund LADOT non-CEQA recommendations is noted. This request will be forwarded to decision-makers for their consideration. Whether or to what extent to adopt or fund such measures is a policy decision for decision-makers, to be made within the constraints associated with FAA funding for off-site improvements. This issue is no longer part of the CEQA process, but is to be considered separately outside of that process.

ATMP-PC025-13

Comment: In closing, The Neighborhood Council of Westchester Playa [NCWP] understands the importance of a safe, modern and efficient "world class airport". And equally understands the needs of our residents to be protected from the unmitigated negative impacts of expanding airport operations. Unfortunately, the data poses tremendous unmitigated impacts and concerns to our neighborhood –

- LAX flight operations growing to 800,000 flights in 2028 from 715,000 in FY 2018.
- Construction of 2 new terminals with 18 to 27 gates combined
- Passenger increase to 110.8 million by 2018 (a 30 % increase over today) and increasing to 128 million by 2045 and

• Significant unavoidable environmental impacts to air quality, greenhouse gas emissions, noise and transportation
• No community benefits

We need to work together in making Los Angeles and all of California the best place to visit or live. We want LAX to be a "world class airport and a first class neighbor". While we are supportive of the Airfield Modernization portion of the project, we are not in favor of Terminal Expansion. As such, the NCWP will not support the project as currently configured. The NCWP board is happy to reconsider our position if during the legislative approval process significantly more community benefits are included in the project.

Response: The comment is noted and will be included in the Final EIR for consideration by the decision-makers prior to taking any action on the LAX Airfield and Terminal Modernization Project. With regards to the commenter's desire that LAX be a "world class airport and a first class neighbor," as stated in Section 2.3.2.1 of the Draft EIR, an underlying purpose of the proposed Project is to support the ongoing modernization of LAX, which will contribute to LAX's role as a world class airport. Moreover, in the underlying purpose, LAWA states its commitment to working closely with neighboring communities to reduce airport-related impacts. With regards to the projected increase in flight operations and passenger activity levels at LAX between 2018 and 2028, please see Response to Comment ATMP-PC025-2 above. With regards to significant unavoidable environmental impacts to air quality, greenhouse gas emissions, noise, and transportation – including mitigation measures proposed to reduce these impacts – please see Sections 4.1.1, 4.4, 4.7, and 4.8 of the Draft EIR. With regards to community benefits, LAWA has a long-standing history of working with the community and other stakeholders to address issues related to development at LAX. With respect to the proposed Project, LAWA has met with community organizations to discuss their concerns and would continue to work with these stakeholders during Project design and implementation.

ATMP-PC026 Munoz, Armando SEIU USWW 3/15/2021

ATMP-PC026-1

Comment: News has gone around thru LA that this huge expansion is being proposed, but what about the workers at LAX? the cabin cleaners that clean body fluids nobody would want to touch? bag runners that work overtime to afford their college tuition? passenger service agent who can barely pay their bills because our hours are cut? In the 11 years I have worked at this airport, LAX has not prioritized workers. I started at 9 dollars an hour and at one time I had to live in my car because I couldn't afford my mortgage, we were able to win better wages by getting involved with the union. With COVID I was about be in the same situation before the CARES acts passed, but things haven't changed. Unemployment isn't going to last forever. Another you may not know is that LAX workers don't have any retirement, even workers who have been working 30 years at the airport, many work past retirement age because they can't afford to retire. Rents are so high now in LA. If you are going all out on expanding, then you need to go all out supporting LAX workers as well.

Response: The comment is noted and will be included in the Final EIR for consideration by the decision-makers prior to taking any action on the LAX Airfield and Terminal Modernization Project. The purpose of an EIR is to focus on a project's physical environmental effects as required by CEQA. Purely economic impacts are not required to be analyzed under CEQA (State CEQA Guidelines Section 15064(e)). Nevertheless, this issue is of importance to LAWA. The proposed Project would result in a daily total of approximately 4,700 new long-term employees associated with the operation of Concourse 0 and Terminal 9 and thousands of construction jobs between 2022 and 2028. Some of the policies and programs aimed at improving the economic benefit of jobs linked to LAX projects are described below.

Pursuant to Los Angeles Administrative Code, Division 10, Chapter 1, Article 11, Section 10.37 et seq., contractors/ subcontractors who have agreements with the City, including those associated with LAX, must comply with all applicable provisions of the Living Wage Ordinance, including paying their employees a minimum "living wage" that generally includes health benefits (or an increased cash wage if benefits are not included) and provides compensated days off. More information about this program can be found here: City of LA Living Wage Ordinance Info.[1] Pursuant to LAWA's First Source Hiring Program (FSHP) Policy, any contracts awarded in association with the proposed Project would be subject to the applicable provisions of the FSHP for LAX airport jobs.[2] This program targets local residents for early access to available LAX airport jobs. LAX employers receive prompt, cost-free referrals of qualified applicants. To provide local residents with access to well-paying construction careers, LAWA established the HireLAX Apprenticeship Readiness Program (HireLAX). About 80 percent of HireLAX graduates work in construction. For more information on this program, please visit: https://www.lawa.org/lawa-employment/lawa-hirelax/hirelax.[3] Finally, in accordance with the Board of Airport Commissioners' Resolution 23437, all concessionaires associated with Concourse 0 or Terminal 9 would be subject to LAWA's Labor Peace Agreement requirements.[4]

In addition to these programs, LAWA has established a Certified Service Provider Program (CSPP) under which it issues Certified Service Provider License Agreements (CSPLA) to advance airport safety and security by certifying individuals and/or businesses providing specific services at LAX. The goals of the CSPP include improving vehicle and equipment safety, and enhancing employee training at LAX. The program applies to entities that provide services to airlines, tenants, consortiums, and/or service providers at LAX.[5]

The potential for the proposed Project to result in impacts to housing was evaluated in the Initial Study, which is included in Appendix A of the Draft EIR. As concluded in the Initial Study, the proposed Project would not displace existing housing or people. The proposed Project would have no impacts on housing and no mitigation would be necessary. Moreover, LAWA does not have any authority or control over housing, including affordable housing. However, the City of Los Angeles has plans to address affordable housing in the City. Specifically, the Department of City Planning is currently working alongside the Housing and Community Investment Department (HCIDLA) to update the Housing Element of the City's General Plan, also called "the Plan to House

LA."[6] The draft plan includes a goal to increase housing production, with an emphasis on housing production that is affordable to lower income households. Policies and programs for implementing this goal include locating new sources of local financing for affordable housing, targeted loan programs for homeowners, and land use changes to increase sites where affordable housing can be built. The Housing Element projects a significant increase in housing production at all income ranges compared to prior cycles.

[1] City of Los Angeles Department of Public Works, Bureau of Contract Administration, Living Wage Ordinance (LWO). Available: https://bca.lacity.org/living-wages-ordinance-lwo; accessed July 10, 2021.
[2] City of Los Angeles, Los Angeles World Airports, First Source Hiring Program Policy, February 27, 2020.
[3] City of Los Angeles, Los Angeles World Airports, HireLAX. Available: https://www.lawa.org/lawa-employment/lawa-hirelax/hirelax; accessed July 10, 2021.
[4] City of Los Angeles, Los Angeles World Airports, Labor Peace Agreements. Available: https://www.lawa.org/lawa-businesses/lawa-administrative-requirements/labor-peace-agreement; accessed July 10, 2021.
[5] City of Los Angeles, Los Angeles World Airports, Certified Service Provider Program (CSPP) – Certified Service Provider License Agreement (CSPLA). Available: https://www.lawa.org/cspp, accessed July 9, 2021.
[6] City of Los Angeles, Los Angeles Housing Element 2021-2029, released July 1, 2021. Available: https://planning.lacity.org/odocument/5c38d3af-c5af-4c6c-b14e-1959b23e9295/Full.HE.Doc.LowRez.pdf.

ATMP-PC027 Clark, Brian UCLA 3/15/2021

ATMP-PC027-1

Comment: No new gates or expansion to LAX. The surrounding neighborhoods are already unlivable because of noise and pollution. The people on the ground matter. Not to the FAA or to LAWA but they matter. Find a way to get quiet non-polluting airplanes instead. ENOUGH!

Response: The comment is noted and will be included in the Final EIR for consideration by the decision-makers prior to taking any action on the LAX Airfield and Terminal Modernization Project. Noise and air quality impacts of the proposed Project are addressed in Sections 4.7 and 4.1.1 of the Draft EIR, respectively. Additionally, the Draft EIR includes multiple mitigation measures to minimize noise and air quality impacts. (See Sections 4.7.3, 4.1.1.7, and 4.1.2.7 of the Draft EIR.) Further, as explained in Section 2.3.1.2.2 of the Draft EIR, the annual activity forecast and regression analysis prepared by LAWA's aviation experts determined that aircraft operations would be the same in 2028 with or without the proposed Project, and that the proposed Project would not result in increased aviation and/or passenger activity levels or capacity at LAX. This analysis is supported by substantial evidence as documented in Appendix B.1 of the Draft EIR. Please see Topical Response TR-ATMP-G-1 for further discussion of the validity of this forecast.

LAWA has a long-standing history of working with the community and other stakeholders to address issues related to development at LAX. With respect to the proposed Project, LAWA has met with community organizations to discuss their concerns and would continue to work with these stakeholders during Project design and implementation.

ATMP-PC028 Wagner, Debi None Specified 3/15/2021

ATMP-PC028-1

Comment: I am submitting these comments on behalf of myself, a private citizen.

The purpose of the project appears to be enhancing safety and efficiency. These terms are much better understood as: Increasing peak hourly aircraft throughput without exceeding acceptable safety risk.

The purpose of adding gates is to increase hourly availability which increases operational throughput. The potential turnover at a gate is on average, one aircraft per hour. Adding 3-12 gates can increase throughput by 85,000 operations per year. This figure mirrors the projected growth in 2018 to 2028, the planning years for baseline and future scenario.

Response: As indicated in Section 2.3 of the Draft EIR, which present the Project Objectives, the proposed Project airfield improvements are proposed to enhance safety and operational flexibility and management of the LAX airfield while working within the limits of the existing 4-runway system. The airfield improvements are only associated with runway exits and taxiways. The potential changes associated with these proposed Project improvements were analyzed and documented in Appendix B.2 of the Draft EIR. See Response to Comment ATMP-AL010-205 for a discussion regarding differences in operational conditions resulting from the proposed Project improvements (e.g., runway occupancy times, in-trail aircraft separation, operating configurations, etc.).

As documented in the concluding paragraph in Section 4.3 on p. 4-6 of Appendix B.1 of the Draft EIR, the airfield component would be the first of the three airport system components (airfield, terminal, and landside) to constrain the ability of LAX to accommodate the forecasted unconstrained demand. Contrary to the commenter's assertion, additional gates provided by the proposed Project would not change the ability of the airfield system to accommodate additional operations, or as cited by the commenter, "increase[es] operational throughput."

Please see Sections 3.2.3 and 3.3 of Appendix B.1 of the Draft EIR for a discussion of forecasted aircraft operations. As further documented in Section 3.4 of Appendix B.1, the aircraft operation forecasts were prepared independently from any existing or future constraints at LAX. Therefore, additional aircraft operations forecasted between 2018 and 2028 were not a result of either additional airfield throughput or gate availability, as asserted by the commenter. Please see Topical Response TR-ATMP-G-1 for further discussion of the validity of LAWA's aviation forecast.

ATMP-PC028-2

Comment: This number of aircraft will produce above de-minimus levels of annual tons per year emissions for criteria pollutants of concern, NOx, VOC, SOx and PM 10, 2.5. Because the area is in non-attainment for several criteria pollutants of concern, increasing emissions DOES pose a health risk. When de-minimus levels are exceeded, regardless of the SIP emissions inventory, and when potential exceedances of the federal standards exist or are worsened as a result of the project, potentially causing delay to attainment, federal agencies such as the FAA are prohibited from funding, supporting or approving those projects. The preliminary conformity determination admits these potential inventory and exceedance conditions are present but claims the significance is unavoidable.

Response: The commenter seems to be conflating the requirements of the Draft EIR with those of Federal environmental evaluation requirements. The commenter implies that a preliminary conformity determination had been published at the time of the publication of the Draft EIR, and then asserts that the preliminary conformity determination found the Project's emissions inventory to exceed "de minimis" levels and claims the significance of the exceedance is unavoidable. Contrary to the commenter's assertions, the California Environmental Quality Act (CEQA) does not require a Draft General Conformity Determination. Furthermore, the Draft General Conformity Determination for the proposed Project was not published in October 2020 at the time of the publication of the Draft EIR. Rather, the Draft General Conformity Determination, including the final protocol for its preparation, was published in May 2021 for public review at the same time as the Draft Environmental Assessment and is available on LAWA's website at www.lawa.org/ATMP. The Federal Aviation Administration (FAA), in coordination with LAWA, prepared both a federal Environmental Assessment under the National Environmental Policy Act and a General Conformity Determination under the Clean Air Act.

Moreover, the commenter appears to confuse the basis of a significance determination under CEQA and the basis of a determination regarding whether or not a Project's emissions would exceed "de minimis" levels established under the General Conformity regulations. Under CEQA, Project-related emissions in 2028 were compared to emissions under existing conditions, defined as 2018 for the purposes of the air quality analysis (see introduction to Chapter 4 of the Draft EIR regarding the environmental baseline used in the analysis). Conversely, the evaluation of emissions conducted for the General Conformity Determination compared future emissions with the implementation of the proposed Project to future emissions without the Project.

ATMP-PC028-3

Comment: It would be critical to know if existing configuration and number of gates precludes the safe incremental increased operations. This used to be called max capacity. There is a theoretical maximum capacity of the existing airport. Once max capacity is reached, a cap is placed on adding any more operations. That maximum number is based on peak hour/day arrival.

Response: The existing configuration and number of gates at LAX can accommodate the future activity levels projected to occur in the analysis horizon year of 2028 (i.e., buildout year for the Project). More specifically, as documented in Section 2 of Appendix B.2 of the Draft EIR, the design day flight schedule (DDFS) for 2028 was successfully gated under the No Project scenario (i.e., without proposed Project improvements). In addition, the 2028 DDFS was also successfully simulated using an airfield simulation model approved by the FAA as documented in Section 3 of Appendix B.2.

Regarding the measure of airfield capacity, please see Section 4.2.1 of Appendix B.1 of the Draft EIR, which discusses the concepts of throughput capacity (which is a measure of the maximum number of aircraft operations which can be accommodated on the airport in an hour, as noted by the commenter) and practical capacity. Section 4.2.1 of Appendix B.1 further documents the definition of practical capacity used for the purposes of the proposed Project analyses. Please see Topical Response TR-ATMP-G-1 for further discussion of the validity of LAWA's aviation forecast.

ATMP-PC028-4

Comment: The statement that impacts do not "move the dial" with regard to regional human health impacts seems odd and inappropriate when talking about health impacts to people living near the airport. The expected impacts to people include high risk of cardio-vascular diseases, asthma, cancer, shortened lifespan, etc., not to mention noise induced problems including sleep loss and cumulative impacts of both noise and emissions combined found to cause overlapping heart, brain, metabolic, cognitive, low-birth weight and pre-term birth effects. Most people would consider that a worsening of impacts of this type due to an ever increasing pollution load would move the dial.

Response: The phrase "move the dial," referred to by the commenter, is on pages 4.1.1-17, 4.1.1-42, and 4.1.1-49 in Section 4.1.1 of the Draft EIR, and was specifically related to the relative magnitude of the change in regional human health impacts from ozone precursor and PM2.5 emissions from the proposed Project, as compared to emissions from the same pollutants as determined by the Draft Environmental Impact Report for Amendment to Norman Y. Mineta San Jose International Airport Master Plan (hereafter referred to as the SJC Master Plan Amendment Draft EIR)[1] and the Draft Environmental Impact Report for the Inglewood Basketball and Entertainment Center Project (hereinafter referred to as the IBEC Draft EIR)[2]. As discussed on page 4.1.1-49 of the Draft EIR, the models available to analyze regional impacts are designed to address large, regional changes in emissions, such as those due to proposed emission control regulations that affect emissions across an entire region. As also indicated on page 4.1.1-49 of the Draft EIR, the studies evaluated in Section 4.1.1.2.6.2 of the Draft EIR determined that the results to human health impacts in the SJC Master Plan Amendment Draft EIR and the IBEC Draft EIR were not statistically different than zero (i.e., no change).

Given that these full-scale studies noted above found negligible changes to regional health impacts, LAWA determined that regional dispersion and health impact assessments were not warranted. Gross emission ratios from the emissions modeled in

the SJC Master Plan Amendment Draft EIR and the IBEC Draft EIR studies were applied to the construction and operational emissions of the proposed Project and the results similarly indicate that the impacts to human health due to changes in ozone and PM2.5 precursors associated with the proposed Project would be essentially zero. This analysis of these studies, and their application to the proposed Project, only addressed regional human health impacts from certain air pollutant emissions (ozone precursors and PM2.5). It is likely that performing such modeling for the LAX Airfield and Terminal Modernization Project would cost in excess of $100,000. Yet, as the analyses performed for the IBEC and SJC Master Plan Amendment show, these tools do not provide meaningful information. LAWA, in its discretion, has determined that spending such a large amount of money to provide information of limited, if any, value would be an imprudent use of public funds. That is particularly true where, as here, LAWA can draw conclusions from the analyses performed for IBEC and the SJC Master Plan Amendment EIRs.

A full human health risk assessment for the proposed Project was conducted that evaluated cancer risks, increased chronic (long-term) non-cancer health hazards, and increased acute (short-term) non-cancer health hazards from inhalation of toxic air contaminants (TAC). This assessment focused on impacts to on-site workers and people living near the airport. Results of this assessment are documented in Section 4.1.2 and Appendix C of the Draft EIR.

With regards to the commenter's assertion regarding human health impacts to people living near the airport (i.e., high risk of cardio-vascular diseases, asthma, cancer, shortened lifespan, noise-induced problems including sleep loss, and cumulative impacts of both noise and air pollutant emissions combined found to cause overlapping heart, brain, metabolic, cognitive, low-birth weight and pre-term birth effects), health risk assessment cannot be used to link individual illnesses to past chemical exposures, nor can health risk assessments and epidemiological studies definitively show causation between exposure to a specific toxic substance and an individual's illness.[3] In particular, it would not be possible to link health risks estimated by risk assessment to observed health effects for an airport through epidemiological studies because of the typical lack of exposure information about the study population. This population may have lived in the area for many years or just a few weeks. They may have had exposure to chemicals from other sources, such as work or emissions from other sources (e.g., automobile exhaust). They may have engaged in behavior such as smoking, drinking, overeating, or other lifestyle habits that increased their risk of adverse health effect. They may have been exposed to short-term high concentrations of background (non-airport related) urban air pollutants due to meteorological conditions. Further, health effects may be unrelated to chemical exposure at all. For example, people may have exercise-induced asthma, or asthma that is triggered by allergens, molds, or other environmental agents. Thus, simple observations of adverse effects provide little information on health effects due to exposure to airport-related pollutant emissions.

Although subject to a number of uncertainties common to epidemiological studies, such studies have been performed at other airports in large metropolitan areas to help determine whether individuals living near airports have a greater incidence of disease than populations living in other areas. For example, the Illinois Department of Public

Health examined actual cancer incidence observed in communities near Chicago's O'Hare and Midway airports between 1987 and 1997.[4] Results of the study showed no elevation in cancer incidence for all cancers combined among whites, non-whites, males, and females living near the airports. Trend analysis did not indicate a higher cancer burden for populations near the airports as compared to populations living farther away. A study conducted by the Washington State Department of Health provided an examination of actual cancer cases near Washington State's SeaTac airport.[5] Results of the study indicated that incidence of cancer was not statistically significantly higher for the SeaTac area.

As discussed in Section 5.2 of Appendix C.6, Human Health Risk Assessment Technical Report, of the Draft EIR, a 2020 study by the University of California, Los Angeles (UCLA) examined the role of ultrafine particulates (UFPs), which are less than 0.1 micrometers in aerodynamic diameter, from jet aircraft emissions in increased rates of preterm births from pregnant mothers living downwind of LAX.[6] UFPs are emitted from internal combustion engines including on-road vehicles, stationary sources (such as generators), and aircraft. The study looked at birth records between 2008 and 2016 for all mothers living within 15 kilometers (9 miles) of LAX. The study considered other known variables that influence preterm birth, including airport noise levels and the mother's age, education level, and race. In addition, nitrogen dioxide (NO2) was used as a proxy for traffic levels.

Air dispersion modeling was used to predict the concentration of UFPs along two incoming flight paths, which was further validated by mobile air measurements of daytime UFP concentrations.[7] The study found that mothers living in the area with the largest concentration of UFP were about 14 percent more likely to have a preterm birth than mothers living in the area with the lowest concentration of UFP. While the data suggests that airplane pollution (beyond the air pollution caused by traffic in the study area) contributes to preterm births, the study is not sufficient to prove a causal effect. Many variables that could impact the results of the study were not controlled by researchers.[8] For example, they could not confirm how much time the mothers spent exposed to airport UFP or whether they lived in homes with indoor air filtering systems. While this study is suggestive of UFP impacts and calls for future studies to evaluate the potential impacts of UFP, the state of the science regarding these particles and their contribution to preterm births is not yet conclusive.

Another study conducted in Los Angeles in 2019[9] related inhaling UFPs with higher inflammation in the blood shortly after exposure in asthmatic adults. Although the study was able to connect quick and acute health effects with UFP exposure, the study duration was not long enough to definitively understand whether impacts are temporary and reversible or long-term.

In 2020, the U.S. Environmental Protection Agency (USEPA) conducted a policy assessment on particulate matter.[10] According to this assessment, the studies on UFPs are limited and not sufficient to inform policy-relevant conclusions; thus, UFPs are not routinely monitored or regulated by state or federal governments.

One of the limitations to airport epidemiological studies is that they treat people living adjacent to an airport as if they were similar to living farther from airports. In fact, many factors can vary between populations including time of residence, race, socioeconomic status, smoking behavior, age of housing, and so on. A significant difference in one or more of these factors between close and far populations would make studies very difficult to interpret. Moreover, airport studies to date have not been able to assess actual exposure of individuals. Distance from an airport is a crude and unreliable measure of exposure due to the influence of wind speed and direction, terrain, buildings, time spent indoors and out, time spent away from the airport at work or school, and other factors.[11]

Some reports, including studies conducted in the Los Angeles area, suggest association between respiratory illnesses, such as asthma and allergies, and levels of some criteria pollutants and/or TAC. In addition, some people may be more sensitive than the majority of the population to the effects of TAC. These people are considered "sensitive" receptors, and may include children, the elderly, people in poor health and/or those suffering from illness, such as chronic bronchitis. Sensitive individuals may form a subpopulation of people living in the Los Angeles basin that do suffer some health impacts due to poor air quality. Possible associations between illness and air quality, and the existence of sensitive individuals suggest that common sources of air pollutants could cause some health impacts at the concentrations in air found in the Los Angeles basin.

However, according to the South Coast Air Quality Management District (SCAQMD) studies, the higher pollution levels noted from SCAQMD's fixed site monitoring were found to be in Burbank, Central Los Angeles, Huntington Park, and Pico Rivera. SCAQMD's modeling analysis found the highest risks in Huntington Park.[12] MATES-IV found areas of higher risk near the ports, Central Los Angeles, and along transportation corridors, suggesting that general air pollution from car and truck traffic, not single sources such as LAX, would have locally greater impacts on health impacts.

A discussion of the effects of noise on humans is provided in Section 4.7.1.1.3 of the ATMP Draft EIR. Please also see Topical Response TR-ATMP-N-2 regarding health effects of noise.

[1] City of San Jose, Draft Environmental Impact Report for Amendment to Norman Y. Mineta San Jose International Airport Master Plan, State Clearinghouse No. 2018102020, prepared by David J. Powers & Associates, Inc., November 2019. Available: https://www.sanjoseca.gov/Home/ShowDocument?id=44618.
[2] City of Inglewood, Inglewood Basketball and Entertainment Center Project Draft Environmental Impact Report, State Clearinghouse No. 2018021056, prepared by ESA and Fehr & Peers, December 2019. Available: https://www.cityofinglewood.org/1036/Murphys-Bowl-Proposed-NBA-Arena.
[3] California Environmental Protection Agency, Office of Environmental Health Hazard Assessment, Air Toxics Hot Spots Program, Risk Assessment Guidelines, Guidance Manual for Preparation of Health Risk Assessments, February 2015.

[4] Illinois Department of Public Health, Office of Epidemiology and Health Systems Development, Cancer Incidence in Populations Living Near Chicago O'Hare and Midway Airports, Illinois 1987 - 1997, November 2001.
[5] Washington State Department of Health, Office of Epidemiology. Cancer Rates in the Proximity of SeaTac International Airport (Questions 1 and 2 of the August 1998 Work Plan), February 1999.
[6] Wing, Sam E., Timothy V. Larson, Neelakshi Hudda, Sarunporn Boonyarattaphan, Scott Fruin, and Beate Ritz, "Preterm Birth among Infants Exposed to in Utero Ultrafine Particles from Aircraft Emissions," Environmental Health Perspectives, 128(4), 2020. Available: https://ehp.niehs.nih.gov/doi/pdf/10.1289/EHP5732.
[7] Konkel, Lindsey. "Move Over, Traffic: Aircraft Emissions and Preterm Birth," Environmental Health Perspectives, 128(7), 2020. Available: https://ehp.niehs.nih.gov/doi/pdf/10.1289/EHP7161.
[8] Bakalar, Nicholas, "Living Near an Airport May Raise Risks of Preterm Birth," New York Times, August 11, 2020. Available: https://www.nytimes.com/2020/08/11/well/family/living-near-an-airport-may-raise-risks-of-pretermbirth.html.
[9] Wendy Gutschow, "Airport pollution linked to acute health effects among people with asthma in Los Angeles," USC Environmental Health Centers, February 14, 2019. Available: https://preventivemedicine.usc.edu/tag/wendy-gutschow/#:~:text=Airport%20pollution%20linked%20to%20acute%20health%20effects%20among,activity%20at%20the%20Los%20Angeles%20International%20Airport%20%28LAX%29.
[10] U.S. Environmental Protection Agency, Policy Assessment for the Review of the National Ambient Air Quality Standards for Particulate Matter, EPA-452/R-20-002, 2020. Available: https://www.epa.gov/sites/production/files/2020-01/documents/final_policy_assessment_for_the_review_of_the_pm_naaqs_01-2020.pdf.
[11] Illinois Department of Public Health, Office of Epidemiology and Health Systems Development, Cancer Incidence in Populations Living Near Chicago O'Hare and Midway Airports, Illinois 1987 - 1997, November 2001.
[12] South Coast Air Quality Management District, Multiple Air Toxics Exposure Study (MATES-IV) for the South Coast Air Basin, May 2015.

ATMP-PC028-5

Comment: Because NextGen procedures also increase hourly throughput, the added gates are necessary to accommodate added hourly movements. As the nation's airports airspace and ground have become more congested, the two improvements of concentrated paths, reduced distance between aircraft and added gates have now become the only tools left for the growth of the airline industry due to land limitations at constrained airports.

Response: Please see Response to Comment ATMP-PC038-104 for a discussion of NextGen technology and assumptions made in the Draft EIR simulation analyses.

ATMP-PC028-6

Comment: Without the project, airspace and ground congestion may preclude more hourly operations due to an incremental increased safety risk factor. FAA has failed to provide that risk assessment. Since the public is unable to compare the with/without project scenarios in terms of safety risk, nobody really knows whether the increased operations will occur or can occur without the improvements. This vague and irresponsible premise is what all expansion programs purpose and need are founded upon. Comparing future noise, emissions, and other impacts significance depends on this admission. If the same number of operations will come in the future whether you build it or not, why build it? There must be a purpose for spending billions of dollars besides a minor increase in efficiency. Added gates add throughput which adds polluters which increases pollution. And because jet aircraft are each a factory worth of emissions, each added aircraft is a major added source of public health risk.

Response: Section 2.3.2 of the Draft EIR presents the Project objectives, which describe the underlying purpose of why LAWA intends to implement the proposed Project. As indicated in Section 2.3.2.2, one objective is to enhance the safety of the north airfield complex, and Section 2.4.1.2 describes how and why the proposed relocation and reconfiguration of the runway exits on Runway 6L-24R would serve to enhance airfield safety. As indicated in Appendix B.1 of the Draft EIR, the same number of aircraft operations would occur in the analysis horizon year with or without the proposed Project improvements. Improving airfield efficiency is only one component of the overall LAX Airfield and Terminal Modernization Project. As discussed in Section 2.3.2.1 of the Draft EIR, the proposed Project would support ongoing modernization of LAX by enhancing the safety and operational flexibility and management of the airfield; improve the quality of the passenger experience and efficiency of passenger processing; and improve the roadway system to more efficiently route airport-related traffic. Please see Topical Response TR-ATMP-G-1 for further discussion of the validity of LAWA's aviation forecast.

The commenter's statement that "[a]dded gates add throughput which adds polluters which increases pollution" is overly simplistic because it fails to consider the relationship between the airfield system component and the gate component at LAX. As documented in Section 4.3 of Appendix B.1 of the Draft EIR, the airfield system component would be the first airport system component to constrain the ability of LAX to accommodate unconstrained demand. Therefore, adding new gates does not alleviate any airfield system limitations, and would not allow the airfield system component to accommodate additional aircraft operations. As documented in Section 1.1.3 of the Draft EIR, the proposed Project airfield improvements aim at enhancing safety and operational flexibility while working within the limits of the existing 4-runway system. The airfield improvements are only associated with runway exits and taxiways. The potential changes associated with the proposed Project airfield improvements were analyzed and documented in Appendix B.2 of the Draft EIR. See Response to Comment ATMP-AL010-205 for a discussion regarding differences in operational conditions resulting from the proposed Project improvements based on airfield simulation analyses which were used as input into the aircraft emission analyses. Therefore, the Draft EIR technical analyses appropriately analyzed potential pollutants and aircraft emissions, reflecting the

limitations of the airfield system component at LAX and additional gates at Concourse 0 and Terminal 9.

ATMP-PC028-7

Comment: This evaluation also does not give information about HAP health risks citing a lack of information. Many hazardous air pollutants have corresponding risk factors. The emissions of each HAP is known and can be modeled with risk factors to determine what the lifetime risk increase is for downwind communities. Within the area affected by HAP from LAX are communities eligible for environmental justice consideration. Because social equity initiatives around the country are very focused on alleviating disproportionate impacts to communities more vulnerable and less able to understand and/or protect themselves, it seems especially egregious this plan would ignore a type of analysis that can better prepare communities for climate and living resilience.

Response: The commenter's use of terminology for "HAP" is unclear. As defined by the U.S. Environmental Protection Agency (USEPA), "[h]azardous air pollutants, also known as toxic air pollutants or air toxics, are those pollutants that are known or suspected to cause cancer or other serious health effects, such as reproductive effects or birth defects, or adverse environmental effects."[1] According to this definition, hazardous air pollutants and toxic air pollutants are the same. In the Draft EIR, air toxics are referred to as "toxic air contaminants" (TAC).

As stated in Appendix C.6, Human Health Risk Assessment Technical Report, of the Draft EIR, "[t]he human health risk assessment (HHRA) presented in this technical appendix estimates cancer risks, chronic (long-term) non-cancer health hazards, and acute (short-term) non-cancer health hazards associated with exposure to toxic air contaminants (TAC) that would be emitted during construction and operation of the Los Angeles International Airport (LAX) Airfield and Terminal Modernization Project (proposed Project)." Appendix C of the Draft EIR describes in detail the air quality modeling used to model the emissions from the proposed Project, and the human health risk assessment that was conducted to estimate the possible human health risks associated with the proposed Project were estimated using modeled TAC concentrations in air and standard methods developed by the California Environmental Protection Agency (CalEPA) and the USEPA. The results of this assessment are provided in Section 4 and summarized in Section 6 of Appendix C.6 of the Draft EIR.

With respect to linking health effects in the surrounding communities to emissions from LAX, please see Response to Comment ATMP-PC028-4 regarding epidemiological studies that have been performed at other airports in large metropolitan areas to help determine whether individuals living near airports have a greater incidence of disease than populations living in other areas.

Regarding the comment that there are communities eligible for environmental justice consideration around LAX, at this time, CEQA does not require that an EIR for a proposed project include a separate analysis of environmental justice issues. The Draft EIR does, however, include an analysis of the proposed Project's potential impact on human

health and the environment, on both a project-specific and cumulative basis. In addition, the air quality analysis performed for the proposed Project takes into account the cumulative effect of the proposed Project, in addition to existing emissions in the area. (See Section 4.1.1.6 of the Draft EIR.) As required by NEPA, the Draft Environmental Assessment (EA) for the proposed Project addressed environmental justice. The Draft EA determined that no disproportionately high and adverse human health or environmental impacts to minority and low income populations would occur during construction or operations.[2]

Finally, regarding the claim that "this plan would ignore a type of analysis that can better prepare communities for climate and living resilience," the proposed Project is not a planning document but a construction project. It is not intended to set policy. Regardless, the Draft EIR includes a thorough analysis of the proposed Project's impacts on climate change in Section 4.4.

[1] U.S. Environmental Protection Agency, What are Hazardous Air Pollutants? Available: https://www.epa.gov/haps/what-are-hazardous-air-pollutants, accessed April 29, 2021.
[2] Ricondo and Associates, Inc. and CDM Smith, prepared for Los Angeles World Airports and U.S. Department of Transportation, Federal Aviation Administration, Draft Environmental Assessment and Draft General Conformity Determination, May 2021. Available: https://www.lawa.org/atmp/documents.

ATMP-PC028-8

Comment: QUOTED SECTIONS BELOW:

4.1.1.5.2.3 Significance of Impact After Mitigation With implementation of Mitigation Measures MM-AQ/GHG (ATMP)-3 through 7 and MM-T (ATMP)-1, significant impacts associated with operational emissions would be reduced, but not to a level that would be less than significant.

Specifically, even with implementation of all feasible operations-related mitigation measures, the Project-related estimated incremental increases in daily operations-related emissions of NOX, SOX, PM10, and PM2.5 would exceed the daily emission thresholds established by SCAQMD. No other feasible mitigation measures have been identified at this time that would further reduce impacts to air quality. Therefore, impacts to air quality from Project-related operational emissions would be significant and unavoidable

Response: The comment accurately summarizes the substance of the impact conclusions related to the proposed Project's operational emissions as presented in Section 4.1.1.5.2.3 of the Draft EIR. However, it is noted that the quoted text from Section 4.1.1.5.2.3 contains a typographical error. The mitigation measures that would apply to operational air quality impacts include Mitigation Measures MM-AQ/GHG (ATMP)-3 through 6, not Mitigation Measures MM-AQ/GHG (ATMP)-3 through 7, as stated in the Draft EIR. Section

4.1.1.5.2.3 has been revised to correct this error. Please see Chapter F3, Corrections and Clarifications to the Draft EIR.

ATMP-PC028-9

Comment: The emissions of CO, V*C, and SOX would exceed the construction emission thresholds during the periods when one of the north runways is closed to safely tie-in the Taxiway D extension. The runway closureperiod would require aircraft to taxi farther to the open runways. Once these connections are completed, taxi times would drop and would be similar to Without Project taxi times. Although these runway closures would be temporary (approximately 4 to 5 months in two different years) relative to the total proposed Project construction duration, they do represent peak day total construction emissions for all pollutants. Construction emissions of NOX would exceed the construction emission thresholds in several years that do not include the runway closures. No other feasible mitigation measures have been identified that would further reduce these impacts to air quality. Therefore, impacts to air quality from Project-related construction emissions would be significant and unavoidable. 4.1.1-44

Response: The comment accurately summarizes the impact conclusions for CO, VOC, and SOX related to the proposed Project's construction emissions as presented in Section 4.1.1.5.1.3 of the Draft EIR. Please see Response to Comment ATMP-PC028-8 regarding correction of the typographical error in the Draft EIR with regards to the numbering of the feasible mitigation measures that apply to these impacts.

ATMP-PC028-10

Comment: Based on the annual activity forecast and regression analysis results, passenger activity at LAX is forecasted to increase from 86.1 MAP in fiscal year (FY) 2018, the baseline year for most of the EIR's environmental analysis, to 110.8 MAP in FY 2028, the horizon year assumed for buildout of the proposed Project, (resulting in a compounded annual growth rate [CAGR] of 2.6. percent), while total annual aircraft operations are forecasted to increase from 715,000 annual operations in FY 2018 to 800,000 annual operations in FY 2028 (resulting in a CAGR of 1.1. percent).

2.3.1.2.2 page 83

Response: The commenter cites the results of the future activity level forecast for LAX that is documented in Table 4-1 of Appendix B.1 of the Draft EIR, and correctly calculated the corresponding compounded annual growth rates.

ATMP-PC028-11

Comment: For the final EIR, it would be helpful to include the following: Conduct a health risk assessment from HAP

Response: The content of this comment is similar to comment ATMP-PC028-7; please refer to Response to Comment ATMP-PC028-7.

ATMP-PC028-12

Comment: Use color coding to map areas of noise, emissions, poor health outcomes, low income/minority, multiple environmental impacts such as traffic and aviation impacts

Response: A color-coded map is not necessary in order to evaluate the environmental impacts of the proposed Project. Noise, air quality, and human health impacts of the proposed Project are addressed in Sections 4.7, 4.1.1, and 4.1.2 of the Draft EIR, respectively. Please see Topical Response TR-ATMP-T-1 regarding the fact that traffic is no longer considered to be an impact on the environment and, therefore, is not addressed in the Draft EIR. Impacts to low income/minority communities are not singled out for identification by CEQA. It is unclear what the commenter is referring to with regards to multiple environmental impacts or aviation impacts.

ATMP-PC028-13

Comment: Map the area of impact from UFP

Response: Particles that fall at or under the 0.1 micrometer size fraction are typically referred to as ultrafine particles (UFP). The Draft EIR includes analyses for PM10 and PM2.5, which are inclusive of smaller diameter particles, including UFP. As stated in Sections 4.1.1.1.1 of the Draft EIR, "[s]ix criteria pollutants were evaluated for the proposed Project's construction and operational activities…[including] fine particulate matter, or particulate matter with an aerodynamic diameter *less than or equal to 2.5 micrometers* (PM2.5)." (Emphasis added.) PM2.5 includes particulate matter with an aerodynamic diameter less than or equal to 2.5 micrometer, which includes UFP.

LAWA funded and oversaw completion of the LAX Air Quality and Source Apportionment Study (AQSAS) in 2013, which included measurements of UFP number, concentration, and particle size distributions at several locations around LAX.[1] However, it is not LAWA's role to monitor and document air pollutant concentrations on a continuous basis, especially for a pollutant that has no specific regulatory limit or threshold – that is the role of the South Coast Air Quality Management District (SCAQMD), the California Air Resources Board (CARB), and the U.S. Environmental Protection Agency (USEPA). Further, as stated in the State CEQA Guidelines, "CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors." (State CEQA Guidelines Section 15204.)

No federal or state ambient air quality standards or regulatory thresholds have been established for UFP, and the Project's potential environmental impacts relating to UFP emissions are adequately analyzed in the Draft EIR's analysis of PM2.5, for which there

are applicable air quality standards and regulatory thresholds. Therefore, no separate analysis for UFP was performed or required for the Draft EIR under CEQA.

[1] City of Los Angeles, Los Angeles World Airports, Final Report - LAX Air Quality and Source Apportionment Study, Volumes 1 – 3, Prepared by Tetra Tech, Inc., June 18, 2013. Available: https://www.lawa.org/lawa-environment/lax/lax-air-quality-and-source-apportionment-study.

ATMP-PC028-14

Comment: Expand discussion to include mitigation of both noise and emissions on residents

Response: Mitigation measures for noise impacts are identified in Sections 4.7.1.5.1.3 and 4.7.3.5.2.2 of the Draft EIR; mitigation measures for criteria pollutant emissions are identified in Sections 4.1.1.5.1.2 and 4.1.1.5.2.2 of the Draft EIR; and mitigation measures for greenhouse gas emissions are identified in Section 4.4.5.1.4 of the Draft EIR.

ATMP-PC029 Turner, Kimberly L. None Specified 3/15/2021

ATMP-PC029-1

Comment: Adding up to 27 new gates will increase negative noise and pollution impacts both near and away from the airport. There must be no expansion of airport facilities without reverting to pre-NextGen flight patterns that were dispersed, had a higher overall profile (less time at low altitudes). Expansion must consider these impacts in the EIR. NextGen concentrated flight patterns are dangerous to communities/bring serious health dangers to the region.

Response: This comment pertains to modifications to aircraft flight paths associated with implementation of the FAA's Next Generation Metroplex program (refer to https://www.faa.gov/nextgen/), specifically the SoCal Metroplex (see https://www.faa.gov/air_traffic/community_involvement/socal/media/Southern_California_Metroplex_Questions_and_Answers.pdf). This is an FAA program and LAWA does not have the authority to revert to pre-Next Generation Metroplex flight patterns.

The proposed Project would not relocate runways at LAX or shift aircraft flight paths in the Los Angeles region. The evaluation of aircraft noise in the Draft EIR was based on baseline (2018) flight track data within the study area. Environmental impacts from the proposed Project, including pollution and noise resulting from aircraft operations, the proposed aircraft gates at Concourse 0 and Terminal 9, and other aspects of the proposed Project, were addressed in detail in the Draft EIR. Specifically, impacts related to aircraft noise, including the health effects of noise, are addressed in Section 4.7.1 and Appendix F.1 of the Draft EIR and impacts related to air quality and human health risk

are addressed in Section 4.1 and Appendix C of the Draft EIR. Please also see Topical Response TR-ATMP N-1 regarding health effects of noise.

ATMP-PC029-2

Comment: Human Health under flight paths MUST BE CONSIDERED for both arrivals and departures. The project should use findings from the recently released NES (Neighborhood Environmental Survey) and use ALREADY EXISTING metrics, specifically N-Above in combination with DNL, to reveal devastating impacts to communities miles from airports. No new gates without studying human health impacts in such a way that does not guarantee a FONSI. FAA's DNL metric and threshold of significance standards guarantee a finding of "no significant impact." It is an IMPOSSIBLE standard to meet away from the airport and the FAA knows that. No new gates. Communities must be considered. No new noise to new communities rarely previously impacted by noise pre-NextGen.

Response: Please see Topical Response TR-ATMP-N-1 regarding health effects of noise and Topical Response TR-ATMP-N-2 regarding adequacy of the aircraft noise analysis and use of alternative metrics.

The Federal Aviation Administration's (FAA) Federal Register Notice, Overview of FAA Aircraft Noise Policy and Research Efforts: Request for Input on Research Activities To Inform Aircraft Noise Policy published January 13, 2021, states "Compared with the Schultz Curve representing transportation noise, the NES results show a substantially higher percentage of people highly annoyed over the entire range of aircraft noise levels (i.e., from DNL 50 to 75 dB) at which the NES was conducted. This includes an increase in annoyance at lower noise levels. The NES results also show proportionally less change in annoyance from the lower noise levels to the higher noise levels. Comparing the percent of population highly annoyed due to noise exposure between the updated Schultz Curve for transportation noise in the 1992 FICON Report and the NES: At a noise exposure level of DNL 65 dB, the updated Schultz Curve from the 1992 FICON Report indicated that 12.3 percent of people were highly annoyed, compared to between 60.1 percent and 70.9 percent within a 95 percent confidence limit from the NES..." It goes on to say that, "[t]he FAA will not make any determinations based on the findings of these research programs for the FAA's noise policies, including any potential revised use of the Day-Night Average Sound Level (DNL) noise metric, until it has carefully considered public and other stakeholder input along with any additional research needed to improve the understanding of the effects of aircraft noise exposure on communities."[1] Therefore, as presented in the Federal Register Notice, the FAA has not changed its policy and regulations related to the use of cumulative noise metrics and the existing dose-response annoyance curve at this point in time. The noise analysis methodology used in this Draft EIR follows existing standards and will not be modified as a result of the NES findings.

As discussed in Section 4.7.1.5.1 of the Draft EIR, the proposed Project would generate operational aircraft noise that would increase noise levels at exterior use areas of residences, schools, hospitals, and places of worship to 65 CNEL or above during

operations, as compared to existing baseline conditions, which would be a significant operational impact. Thus, the methodology and thresholds of significance used by LAWA adequately describes the likely operational aircraft noise impacts of the proposed Project, and do not guarantee a finding of "no significant impact."

[1] U.S. Department of Transportation, Federal Aviation Administration, Overview of FAA Aircraft Noise Policy and Research Efforts: Request for Input on Research Activities To Inform Aircraft Noise Policy, FR Vol 86, No. 8, January 13, 2021. Available: https://www.federalregister.gov/documents/2021/01/13/2021-00564/overview-of-faa-aircraft-noise-policy-and-research-efforts-request-for-input-on-research-activities#print.

ATMP-PC030 Neal, Lashantae SEIU USWW 3/15/2021

ATMP-PC030-1

Comment: This project is a huge expansion and the airlines are going to make lots of money from it. If LAX is approving this then LAX needs to deal with the problems of LAX workers-affordable housing and good jobs. We have a problem with housing being too expensive in the communities where LAX workers like me live. My own uncle went from his own home to my grandmother's garage. So they could support each other. People are doubling up to survive or moving away. More and more people have to move away. My momma just had to move away from LA to afford housing. She was living in California city and commuting all the way to LA. More and more service workers from our neighborhoods are moving far away and commuting long distance to work. Airlines need to be responsible for using good responsible contractors that have good union jobs. When Jet Stream, a non-union company took over American cabin the jobs were not as good, and the employees wanted to the union but it took two years for that to happen. We need a better system to protect workers. We even have problems with our union work places. The race to the bottom with contracting out airline service jobs has created a very unsafe situation where employers cut corners at the expense of lax workers. Our workplace at LAX is very unsafe. The equipment we use to get to our work site. The high lift trucks don't go all the way up so you have to jump over to the plane. The trucks are not working they need to be functional and go all way the up. We don't even enough supplies to do our work like mops, dust pans, we are sent out to work with no tools. We look like fools because we don't have what we need to do our work. We work for the biggest airlines but the contracting companies are so cheap.

Response: The comment is noted and will be included in the Final EIR for consideration by the decision-makers prior to taking any action on the LAX Airfield and Terminal Modernization Project. The commenter's opinion that "the project is a huge expansion" is noted. Please see Topical Response TR-ATMP-G-1 regarding the aviation demand forecast and future aviation activity at LAX. As indicated therein, the forecast growth in passenger activity and aircraft operations by 2028 will occur with or without the proposed Project.

The purpose of an EIR is to focus on a project's physical environmental effects as required by CEQA. Purely economic impacts are not required to be analyzed under CEQA (State CEQA Guidelines Section 15064(e)). Nevertheless, this issue of jobs is of importance to LAWA. Please see Response to Comment ATMP-PC026-1 regarding jobs associated with the proposed Project, City and LAWA policies and programs aimed at improving the economic benefit of jobs linked to LAX projects, worker safety, and affordable housing. As noted in that response, the proposed Project would result in a daily total of approximately 4,700 new long-term employees associated with the operation of Concourse 0 and Terminal 9 and thousands of construction jobs between 2022 and 2028.

ATMP-PC031 Wagner, Suellen None Specified 3/15/2021

ATMP-PC031-1

Comment: Adding up to 27 new gates will increase negative noise and pollution impacts both near and away from the airport. There must be no expansion of airport facilities without reverting to pre-NextGen flight patterns that were dispersed, had a higher overall profile (less time at low altitudes.) expansion must consider these impacts in the EIR. NextGen concentrated flight patterns are dangerous to communities, bring serious health dangers to the region.

Response: The content of this comment is identical to comment ATMP-PC029-1; please refer to Response to Comment ATMP-PC029-1.

ATMP-PC031-2

Comment: Human Health under flight paths MUST BE CONSIDERED for both arrivals and departures. The project should use findings from the recently released NES(Neighborhood Environmental Survey) and use existing metrics, specifically N-above in combination with DNL, to reveal devastating impacts far from airports. No new gates without studying human health impacts in such a way that does not guaranteed a FONSI. FAA's DNL metric and threshold of significance standards are reverse engineered to produce a finding of "no significant impact." No new gates.

Response: The content of this comment is identical to comment ATMP-PC029-2; please refer to Response to Comment ATMP-PC029-2.

ATMP-PC032 Specchierla, Tony None Specified 3/15/2021

ATMP-PC032-1

Comment: No expansion until north arrival flight path is fixed over West Adams. Need to return to 6000 ft and dispersed arrival as current lawsuit with City of LA requested.

Response: This comment pertains to modifications to aircraft flight paths associated with implementation of the FAA's Next Generation Metroplex program (refer to https://www.faa.gov/nextgen/), specifically the SoCal Metroplex (see https://www.faa.gov/air_traffic/community_involvement/socal/media/Southern_California_Metroplex_Questions_and_Answers.pdf). The SoCal Metroplex is not associated with the proposed Project. The proposed Project would not relocate runways at LAX or shift aircraft flight paths in the Los Angeles region.

ATMP-PC033 Robinson, Tristan Ashurst LLP 12/1/2020

ATMP-PC033-1

Comment: 1. What project delivery method will be used to procure and contract for the ATMP (or any portion(s) of it)? For example, are alternative project delivery methods (like a public-private partnership for a design-build-finance-operate-maintain contract, which has been used for the APM and ConRAC P3 projects under the Landside Access Modernization Program) being considered?

Response: The contracting approach and construction delivery methods for the various elements of the proposed Project have not yet been determined.

ATMP-PC034 Munoz, Armando SEIU USWW 12/1/2020

ATMP-PC034-1

Comment: My name is Armando Muñoz and I'm a airport worker and a union member from SEIU-USWW.

My question is what plans does LAWA have to work with the city to convene a community benefits process to mitigate impact on workers and surrounding neighborhoods including housing, displacement, traffic, public transit, good jobs and the environmental health impacts of such a large expansion?

Response: The potential for the proposed Project to result in impacts to housing was evaluated in the Initial Study, which is included in Appendix A of the Draft EIR. As concluded in the Initial Study, the proposed Project would not displace existing housing or people. The proposed Project would have no impacts on housing and no mitigation would be necessary.

Please see Topical Response TR-ATMP-T-1 regarding impacts to traffic. As noted in that topical response, based on State and local requirements, traffic impacts (e.g., level of service, congestion) are no longer considered impacts on the environment and, therefore, are not addressed in the Draft EIR. However, as described in the topical response, in accordance with LADOT's Transportation Assessment Guidelines, LAWA completed a Non-CEQA Transportation Assessment that addresses traffic and public

transit issues. The Non-CEQA Transportation Assessment Report is available at https://www.lawa.org/atmp/documents; however, it does not pertain to the environmental impacts of the proposed Project and is entirely separate from the EIR for the proposed Project.

Please see Response to Comment ATMP-PC035-2 regarding jobs associated with the proposed Project. As noted in that response, the proposed Project would result in a daily total of approximately 4,700 new long-term employees associated with the operation of Concourse 0 and Terminal 9 and thousands of construction jobs between 2022 and 2028.

Impacts to human health are addressed in Section 4.1.2 of the Draft EIR.

LAWA has a long-standing history of working with the community and other stakeholders to address issues related to development at LAX. With respect to the proposed Project, LAWA has met with community and labor organizations to discuss their concerns and would continue to work with these stakeholders during Project design and implementation.

ATMP-PC035	**Sisson, Jordan R.**	**Law Office of Gideon Kracov, on behalf of Service Employees International Union, United Service Workers and UNITE HERE Local 11**	**3/15/2021**

ATMP-PC035-1

Comment: On behalf of Service Employees International Union, United Service Workers West ("USWW") and UNITE HERE Local 11 ("Local 11") (collectively "Commenters"), this Office provides the City of Los Angeles ("City") Los Angeles World Airports ("LAWA") the following comments[1] regarding the Draft Environmental Impact Report (SCH No. 2019049020) ("DEIR")[2] for the above-referenced Airfield and Terminal Modernization Project ("ATMP" or "Project") located at the Los Angeles International Airport ("LAX").

In short, Commenters find that the DEIR fails to adequately analyze Project impacts and mitigation related to traffic, vehicle miles traveled ("VMT"), noise, air quality, and greenhouse gas ("GHG") emissions, and also lacks an adequate project description and any overriding consideration findings. As such, Commenters urge the City/LAWA to stay action on any Project approvals until the issues identified below have been addressed in a recirculated DEIR pursuant to the California Environmental Quality Act, Pub. Res. Code § 21000 et seq., ("CEQA") and 14 Cal. Code Regs. § 15000, et seq. ("CEQA Guidelines").

[1] Please note that pages cited herein are either to the page's stated pagination (referenced herein as "p. ##") or the page's location in the referenced PDF document (referenced herein as "PDF p. ##").
[2] Inclusive of all appendices referenced herein as ("APP-##").

Response: The comment is noted and will be included in the Final EIR for consideration by the decision-makers prior to taking any action on the LAX Airfield and Terminal

Modernization Project. As required by Section 15124 of the State CEQA Guidelines, the Project Description "should not supply extensive detail beyond that needed for evaluation and review of the environmental impact." Chapter 2 of the Draft EIR provides the required detailed description of the proposed Project and complies with Section 15124. Project-related impacts associated with vehicle miles traveled (VMT), noise, air quality, and greenhouse gas emissions, and mitigation measures to address those impacts, are evaluated in Sections 4.8, 4.7, 4.1.1, and 4.4 of the Draft EIR, respectively. Please see Topical Response TR-ATMP-T-1 regarding impacts to traffic. As noted in that topical response, based on State and local requirements, traffic impacts (e.g., level of service, congestion) are no longer considered impacts on the environment and, therefore, are not addressed in the Draft EIR. As required by Section 15093 of the State CEQA Guidelines, LAWA will prepare a Statement of Overriding Considerations that addresses the specific economic, legal, social, technological, or other benefits of the proposed Project that outweigh the Project's unavoidable adverse environmental effects. In accordance with Section 15093(c), the Statement of Overriding Consideration will be included in the record of the Project approval and will be mentioned in the Notice of Determination. The Statement of Overriding Considerations is not required to be published concurrently with publication of a Draft EIR. Responses to the remainder of the comments in this letter are provided in Responses to Comments ATMP-PC035-2 through ATMP-PC035-99 below.

In preparing the Final EIR for the proposed Project, LAWA has reviewed all of the comments received, including the comments in this comment letter, and has carefully considered the responses to these comments and other information provided in the LAX Airfield and Terminal Modernization Project Final EIR. None of the information provided in the Final EIR meets the criteria for recirculation of an EIR as outlined in Section 15088.5 of the State CEQA Guidelines.

ATMP-PC035-2

Comment: This Project can and must do better. Rising inequality threatens Los Angeles' prosperity. There are serious challenges in the region concerning affordable housing and living wage jobs — and COVID has made things even more difficult for our members. USWW and Local 11 work to stem this rising tide of inequality and fight to make our region a place of opportunity for all—a place where their members can work and afford to live. LAWA must better consider to what extent this Project will ensure better permanent service jobs for airline service/hospitality workers near LAX who will feel the significant air quality, GHG, and other impacts caused by the Project. True community and worker benefits—as identified below—are needed if this Project is to be approved.

Response: The comment is noted and will be included in the Final EIR for consideration by the decision-makers prior to taking any action on the LAX Airfield and Terminal Modernization Project. The purpose of an EIR is to focus on a project's physical environmental effects as required by CEQA. Purely economic impacts are not required to be analyzed under CEQA (State CEQA Guidelines Section 15064(e)). Nevertheless, this issue is of importance to LAWA. The proposed Project would result in a daily total of approximately 4,700 new long-term employees associated with the operation of

Concourse 0 and Terminal 9 and thousands of construction jobs between 2022 and 2028. Some of the policies and programs aimed at improving the economic benefit of jobs linked to LAX projects are described below.

Pursuant to Los Angeles Administrative Code, Division 10, Chapter 1, Article 11, Section 10.37 et seq., contractors/ subcontractors who have agreements with the City, including those associated with LAX, must comply with all applicable provisions of the Living Wage Ordinance, including paying their employees a minimum "living wage" that generally includes health benefits (or an increased cash wage if benefits are not included) and provides compensated days off. More information about this program can be found here: City of LA Living Wage Ordinance Info.[1] Pursuant to LAWA's First Source Hiring Program (FSHP) Policy, any contracts awarded in association with the proposed Project would be subject to the applicable provisions of the FSHP for LAX airport jobs.[2] This program targets local residents for early access to available LAX airport jobs. LAX employers receive prompt, cost-free referrals of qualified applicants. To provide local residents with access to well-paying construction careers, LAWA established the HireLAX Apprenticeship Readiness Program (HireLAX). About 80 percent of HireLAX graduates work in construction. For more information on this program, please visit: https://www.lawa.org/lawa-employment/lawa-hirelax/hirelax.[3] Finally, in accordance with the Board of Airport Commissioners' Resolution 23437, all concessionaires associated with Concourse 0 or Terminal 9 would be subject to LAWA's Labor Peace Agreement requirements.[4]

In addition to these programs, LAWA has established a Certified Service Provider Program (CSPP) under which it issues Certified Service Provider License Agreements (CSPLA) to advance airport safety and security by certifying individuals and/or businesses providing specific services at LAX. The goals of the CSPP include improving vehicle and equipment safety, and enhancing employee training at LAX. The program applies to entities that provide services to airlines, tenants, consortiums, and/or service providers at LAX.[5]

The potential for the proposed Project to result in impacts to housing was evaluated in the Initial Study, which is included in Appendix A of the Draft EIR. As concluded in the Initial Study, the proposed Project would not displace existing housing or people. The proposed Project would have no impacts on housing and no mitigation would be necessary. Moreover, LAWA does not have any authority or control over housing, including affordable housing. However, the City of Los Angeles has plans to address affordable housing in the City. Specifically, the Department of City Planning is currently working alongside the Housing and Community Investment Department (HCIDLA) to update the Housing Element of the City's General Plan, also called "the Plan to House LA."[6] The draft plan includes a goal to increase housing production, with an emphasis on housing production that is affordable to lower income households. Policies and programs for implementing this goal include locating new sources of local financing for affordable housing, targeted loan programs for homeowners, and land use changes to increase sites where affordable housing can be built. The Housing Element projects a significant increase in housing production at all income ranges compared to prior cycles.

Responses to the commenter's later comments concerning community and worker benefits are provided in responses to comments below.

[1] City of Los Angeles Department of Public Works, Bureau of Contract Administration, Living Wage Ordinance (LWO). Available: https://bca.lacity.org/living-wages-ordinance-lwo; accessed July 10, 2021.
[2] City of Los Angeles, Los Angeles World Airports, First Source Hiring Program Policy, February 27, 2020.
[3] City of Los Angeles, Los Angeles World Airports, HireLAX. Available: https://www.lawa.org/lawa-employment/lawa-hirelax/hirelax; accessed July 10, 2021.
[4] City of Los Angeles, Los Angeles World Airports, Labor Peace Agreements. Available: https://www.lawa.org/lawa-businesses/lawa-administrative-requirements/labor-peace-agreement; accessed July 10, 2021.
[5] City of Los Angeles, Los Angeles World Airports, Certified Service Provider Program (CSPP) – Certified Service Provider License Agreement (CSPLA). Available: https://www.lawa.org/cspp, accessed July 9, 2021.
[6] City of Los Angeles, Los Angeles Housing Element 2021-2029, released July 1, 2021. Available: https://planning.lacity.org/odocument/5c38d3af-c5af-4c6c-b14e-1959b23e9295/Full.HE.Doc.LowRez.pdf.

ATMP-PC035-3

Comment: This comment letter incorporates by this reference in their entirety the following comment letters: 1) expert traffic comments by RK Engineering Group; 2) expert noise comments by RK Engineering Group; and 3) expert air quality/GHG comments by SWAPE (attached hereto as Exhibits A, B, and C [respectively]).

Response: Please see Responses to Comments ATMP-PC035-48 through 59 regarding comments from RK Engineering Group concerning the Draft EIR's transportation analysis; ATMP-PC035-60 through 71 regarding comments from RK Engineering Group concerning the Draft EIR's noise analysis; and ATMP-PC035-72 through 99 regarding comments from SWAPE concerning the Draft EIR's air quality and greenhouse gas emissions analyses.

ATMP-PC035-4

Comment: I. STANDING OF COMMENTERS

USWW represents more than 40 thousand property service workers across California, including approximately 3,700 employees at LAX (pre-COVID) with an additional 1,300 security/janitorial workers living within approximately six miles of LAX. USWW and its sister local unions have many members, including public sector and healthcare workers, who reside and work in Los Angeles where this Project is located.

Local 11 represents more than 25,000 workers employed in hotels, restaurants, airports, sports arenas, and convention centers throughout Southern California and Phoenix,

Arizona—including more than 5,600 workers at LAX and 900 in the Airport Hospitality Enhancement Zone ("AHEZ") (pre-COVID).

Members of USWW and Local 11 join together to fight for improved living standards and working conditions. Making these comments to public officials in connection with matters of public concern compliance with applicable zoning rules and compliance with the CEQA is protected by the First Amendment, the Noerr-Pennington doctrine, and is within the core functions of the union. Unions have standing to litigate land use and environmental claims. (See *Bakersfield Citizens v. Bakersfield* (2004) 124 Cal.App.4th 1184, 1198.) So too, they have public interest standing given that the Project relates to LAWA's public duty to comply with applicable zoning and CEQA laws, and where USWW and Local 11 seek to have that duty enforced. (See e.g., *Rialto Citizens for Responsible Growth v. City of Rialto* (2012) 208 Cal.App.4th 899, 914-916, n6; *La Mirada Avenue Neighborhood Assn. of Hollywood v. City of Los Angeles* (2018) 22 Cal.App.5th 1149, 1158-1159; *Weiss v. City of Los Angeles* (2016) 2 Cal.App.5th 194, 205-206; *Save the Plastic Bag Coalition v. City of Manhattan Beach* (2011) 52 Cal.4th 155, 166, 169–170.)

Response: The comment regarding the standing of the commenters is noted. Whether the commenters have standing is a legal issue that is outside the scope of the EIR. The comment will be included in the Final EIR for consideration by the decision-makers prior to taking any action on the LAX Airfield and Terminal Modernization Project. No further response is required because the comment does not raise any significant environmental issues. (See Public Resources Code Section 21091(d); State CEQA Guidelines Sections 15088(c), 15204(a).)

ATMP-PC035-5

Comment: II. THE DEIR FAILS TO SATISFY CEQA'S EIR REQUIREMENTS

A. BRIEF BACKGROUND ON CEQA

CEQA requires lead agencies to analyze the potential environmental impacts of its actions in an environmental impact report. (See, e.g., Pub. Res. Code § 21100; *Cmtys. for a Better Env't v. S. Coast Air Quality Mgmt. Dist.* (2010) 48 Cal.4th 310.) The EIR is the very heart of CEQA. (*Dunn-Edwards v. BAAQMD* (1992) 9 Cal.App.4th 644, 652.) "The 'foremost principle' in interpreting CEQA is that the Legislature intended the act to be read so as to afford the fullest possible protection to the environment within the reasonable scope of the statutory language." (*Cmtys. for a Better Env't v. Cal. Res. Agency* (2002) 103 Cal.App.4th 98, 109.)

CEQA'S PURPOSE: CEQA has two primary purposes. First, CEQA is designed to inform decision makers and the public about the potential, significant environmental effects of a project. (See CEQA Guidelines § 15002(a)(1).) To this end, public agencies must ensure that its analysis "stay in step with evolving scientific knowledge and state regulatory schemes." (*Cleveland National Forest Foundation v. San Diego Assn. of Governments* ("*Cleveland II*") (2017) 3 Cal.5th 497, 504.) Hence, an analysis which "understates the severity of a project's impacts impedes meaningful public discussion and skews the

decisionmaker's perspective concerning the environmental consequences of the project, the necessity for mitigation measures, and the appropriateness of project approval." (Id., on remand ("*Cleveland III*") (2017) 17 Cal.App.5th 413, 444; see also *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 564 [quoting *Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 392].)

Second, CEQA requires public agencies to avoid or reduce environmental damage by requiring implementation of "environmentally superior" alternatives and all feasible mitigation measures. (CEQA Guidelines § 15002(a)(2) & (3); see also *Citizens of Goleta Valley*, 52 Cal.3d at 564.) If a project has a significant effect on the environment, the agency may approve the project only if it finds that it has "eliminated or substantially lessened all significant effects on the environment where feasible" and that any significant unavoidable effects on the environment are "acceptable due to overriding concerns." (Pub. Res. Code § 21081; see also CEQA Guidelines § 15092(b)(2)(A) & (B).)

STANDARD OF REVIEW FOR EIRS: Although courts review an EIR using an 'abuse of discretion' standard, that standard does not permit a court to "'uncritically rely on every study or analysis presented by a project proponent in support of its position … [,] [a] clearly inadequate or unsupported study is entitled to no judicial deference.'" (*Berkeley Keep Jets Over the Bay v. Bd. of Port Comm'rs.* (2001) 91 Cal.App.4th 1344, 1355 [quoting *Laurel Heights*, 47 Cal.3d at 409 n. 12].) A prejudicial abuse of discretion occurs "if the failure to include relevant information precludes informed decisionmaking and informed public participation, thereby thwarting the statutory goals of the EIR process." (*San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal.App.4th 713, 722; see also *Galante Vineyards v. Monterey Peninsula Water Management Dist.* (1997) 60 Cal.App.4th 1109, 1117; *County of Amador v. El Dorado County Water Agency* (1999) 76 Cal.App.4th 931, 946.)

SUBSTANTIAL EVIDENCE: Under CEQA, substantial evidence includes facts, a reasonable assumption predicated upon fact, or expert opinion supported by fact; not argument, speculation, unsubstantiated opinion or narrative, clearly inaccurate or erroneous evidence, or evidence of social or economic impacts that do not contribute to, or are not caused by, physical impacts on the environment. (See e.g., Pub. Res. Code §§ 21080(e), 21082.2(c), and CEQA Guidelines §§ 15064(f)(5) & 15384.) As such, courts will not blindly trust bare conclusions, bald assertions, and conclusory comments without the "disclosure of the 'analytic route the . . . agency traveled from evidence to action.'" (*Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 404 405 [quoting *Topanga Assn. for a Scenic Community v. County of Los Angeles* (1974) 11 Cal.3d 506, 515]; see also *Citizens of Goleta Valley* (1990) 52 Cal.3d at 568-569.)

Response: This comment is noted. LAWA acknowledges the comment's characterization of CEQA's requirements for an EIR. In developing the Draft and Final EIR, LAWA has taken all of CEQA's requirements for EIRs into consideration and has produced a Final EIR that complies with CEQA, the State CEQA Guidelines, and all applicable case law interpreting CEQA and the State CEQA Guidelines. The comment will be included in the Final EIR for consideration by the decision-makers prior to taking any action on the LAX Airfield and

Terminal Modernization Project. No further response is required because the comment does not raise any significant environmental issues. (See Public Resources Code Section 21091(d); State CEQA Guidelines Sections 15088(c), 15204(a).)

ATMP-PC035-6

Comment: B. THE DEIR ANALYSIS OF TRAFFIC IMPACTS IS GROSSLY INADEQUATE AND MUST BE REDONE

CEQA requires analysis of traffic impacts related to a project. (See *Kings County Farm Bureau v. Hanford* (1990) 221 Cal.App.3d 692, 727.) In particular, CEQA requires analysis of project-related traffic impacts in a manner that does not minimize cumulative impacts. (See e.g., *Cleveland III*, 17 Cal.App.5th at 444-445 [traffic analysis based on methodology with known data gaps that underestimated traffic impacts necessarily prejudiced informed public participation and decisionmaking); *Kings County Farm Bureau*, 221 Cal.App.3d at 718, 727 [rejecting determination that less than one percent to area emissions was less than significant because analysis improperly focused on the project-specific impacts and did not properly consider the collective effect of the relevant projects on air quality]; *Save Cuyama Valley v. County of Santa Barbara* (2013) 213 Cal.App.4th 1059, 1072 [upheld the use of same thresholds for immediate and cumulative impacts when its application was "undoubtedly more stringent cumulative-impact threshold"]; *Al Larson Boat Shop, Inc. v. Board of Harbor Comm'rs*, (1993) 18 Cal.App.4th 729, 749 [upheld where cumulative impacts were not minimized or ignored].) The relevant inquiry is not only the relative amount of increased traffic that the Project will cause, but whether any additional amount of Project traffic should be considered significant in light of the already serious problem. (See *Los Angeles Unified School District v. City of Los Angeles* (1997) 58 Cal.App.4th 1019, 1025.)

A prejudicial abuse of discretion occurs under CEQA "if the failure to include relevant information precludes informed decisionmaking and informed public participation, thereby thwarting the statutory goals of the EIR process." (*San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal.App.4th 713, 722; see also *Galante Vineyards v. Monterey Peninsula Water Management Dist.* (1997) 60 Cal.App.4th 1109, 1117; *County of Amador v. El Dorado County Water Agency* (1999) 76 Cal.App.4th 931, 946.) The EIR must disclose information that is needed for a reasoned analysis of the issues. (See *Madera Oversight Coalition v. County of Madera* (2011) 199 Cal.App.4th 48, 104.)

While the courts review an EIR using an "abuse of discretion" standard, "the reviewing court is not to 'uncritically rely on every study or analysis presented by a project proponent in support of its position.' A 'clearly inadequate or unsupported study is <u>entitled to no judicial deference</u>.'" (*Berkeley Keep Jets Over the Bay v. Bd. of Port Comm'rs.* (2001) 91 Cal.App.4th 1344, 1355 [emphasis added] [quoting *Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal. 3d 376, 391 409, fn. 12].) Substantial evidence in the record must support any foundational assumptions used for the impact analyses in the EIR. (See e.g., *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal. 3d 553, 568 [EIR must contain facts and analysis, not just bare

conclusions]; *Laurel Heights*, 47 Cal. 3d at 392-93 [agency's conclusions must be supported with substantial evidence].)

As pointed out in expert traffic comments (attached hereto as Exhibit A) the DEIR's traffic analysis contains several flaws that fail to analyze the full extent of the Project's long-term impacts, as well as fails to impose all reasonable feasible mitigation measures. While the expert traffic comment letter speaks for itself, Commenters wish to highlight some of the findings about the DEIR's inadequate traffic analysis, including:

Response: The commenter refers to several court cases associated with cumulative impacts and increased traffic/congestion. Regarding cumulative conditions, Section 4.8.6 of the Draft EIR describes the cumulative transportation impacts associated with three main topics:

(1) Cumulative Impacts Associated with Plans, Programs, Ordinances, and Policies
(2) Cumulative Impacts Associated with VMT, and
(3) Cumulative Impacts Associated with Hazards

The baseline used for the transportation analysis already accounts for other transportation improvement projects that are approved, funded, and scheduled for completion prior to 2028. The analysis of cumulative transportation impacts takes into account all proposed projects that are reasonably foreseeable, focusing on whether the proposed Project has a cumulatively considerable contribution to the combined impacts.

The cumulative analysis concluded the proposed Project would not result in inconsistencies with Plans, Programs, Ordinances, and Policies. Furthermore, no cumulative impacts would occur relative to employee VMT. Cumulative impacts for both passenger VMT and induced VMT were identified as significant and unavoidable, and no other mitigation beyond that presented in Draft EIR mitigation measures (MM-T (ATMP-1)) are feasible.

Concerning the comment on increased traffic and related congestion, as described on page 4.8-18 of the Draft EIR, regulatory changes at the state level have resulted in the "elimination of auto delay, LOS, and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts for land use projects and plans in California." Please see Topical Response TR-ATMP-T-1 regarding CEQA transportation analysis requirements. In addition, the Freeway Safety Analysis described in Section 4.8.2.4.2 and Section 4.8.5.5.1 used capacity analysis to calculate vehicle queue lengths at freeway off-ramps and determined that the proposed Project would not have a negative effect on traffic safety. Please see Topical Response TR-ATMP-G-3 regarding transportation impacts beyond the build-out year. Therefore, the Draft EIR adequately addresses the issue of transportation analysis from a long term/cumulative perspective.

ATMP-PC035-7

Comment: • The DEIR fails to perform a Level of Service ("LOS") analysis even though local traffic guidelines in effect at the time compelled as much.

Response: Please see Topical Response TR-ATMP-T-1 regarding the assessment of transportation effects associated with the LAX Airfield and Terminal Modernization Project that are not subject to CEQA. As noted therein, the Draft EIR was not required to include a Level of Service ("LOS") analysis. However, LAWA completed a Non-CEQA Transportation Assessment in accordance with the City of Los Angeles Transportation Assessment Guidelines in April 2021. The Non-CEQA Transportation Assessment is available at https://www.lawa.org/atmp/documents.

ATMP-PC035-8

Comment: • The DEIR fails to analyze long-term vehicle miles traveled ("VMT") impacts beyond 2028, even though such impacts are admitted.

Response: Please see Topical Response TR-ATMP-G-3 regarding the reasons why 2028 is the appropriate horizon year for evaluating the impacts of the proposed Project. For the reasons explained therein, the Draft EIR's analysis of VMT impacts is accurate and appropriate. In addition, Topical Response TR-ATMP-G-3 includes a general analysis of impacts beyond 2028; this analysis includes a discussion of VMT impacts.

ATMP-PC035-9

Comment: • The DEIR's VMT analysis fails to account for all VMTs, specifically non-passenger trips (e.g., employees and other trips) for this regional serving use. This is inconsistent with local VMT traffic assessment guidelines, which underestimates the full impact of the project.

Response: The content of this comment is substantively the same as that of comment ATMP-PC035-54; please refer to Response to Comment ATMP-PC035-54.

ATMP-PC035-10

Comment: • While the DEIR admits significant unavoidable passenger VMT impacts, no mitigation measures are offered to help relieve this increase in VMT as a result of the project. The DEIR incorrectly proclaims that there is no feasible mitigation to reduce this impact when, in fact, there are numerous additional measures available (e.g., additional off-site van pools and neighborhood shuttles for passengers, expand public transit services, provide public transit subsidies, provide bike-share and car-share programs, improve pedestrian and bicycle infrastructure, etc.).

Response: Please see Topical Response TR-ATMP-T-2 regarding VMT mitigation measures and monitoring for the LAX Airfield and Terminal Modernization Project. As indicated therein, MM-T (ATMP)-1, VMT Reduction Program, in the Draft EIR describes the list of VMT reduction strategies considered available for reducing VMT impacts associated with

the proposed Project. As stated on page 4.8-57 of the Draft EIR, Mitigation Measure MM-TR (ATMP)-1 which addresses employee VMT also includes strategies for reducing passenger VMT. For passenger VMT, the available strategies for reducing VMT are more limited than they are for addressing passenger VMT, are not within the control of LAWA, and are more difficult to monitor and report. As further explained in the topical response, the VMT reduction strategies related to passengers are primarily incentive-based, with no research available on the application of these strategies in an airport context, no certainty as to their effectiveness in reducing VMT, and limited opportunity to document or demonstrate their ability to reduce passenger VMT. Consequently, the Draft EIR acknowledges that the passenger VMT impact associated with the proposed Project would be significant and unavoidable. The topical response also addresses the additional VMT reduction strategies requested by the commenter.

ATMP-PC035-11

Comment: • The DEIR fails to specify any transportation impacts during the seven-year construction phase of the project.

Response: The content of this comment is similar in nature to the content of comment ATMP-AL010-133; please refer to Response to Comment ATMP-AL010-133.

ATMP-PC035-12

Comment: The DEIR's consistency analysis with the City's Mobility Plan 2035 is entirely lacking, whereby it looks to merely three measures of the plan, when the Plan includes more than 50 different policies that should be analyzed.

Response: The content of this comment is substantively the same as comment ATMP-PC035-58; please refer to Response to Comment ATMP-PC035-58.

ATMP-PC035-13

Comment: In sum, as highlighted by the traffic expert comment letter, the DEIR's traffic/VMT analysis and conclusions rely upon faulty assumptions, data gaps, and missing relevant information—which ultimately ignores and minimizes the ATMP's traffic/VMT impacts—and thus violates CEQA. (See e.g., *Cleveland III*, 17 Cal.App.5th at 444-445; *Al Larson Boat Shop, Inc.,* 18 Cal.App.4th at 749; *San Joaquin Raptor/Wildlife Rescue Center*, 27 Cal.App.4th at 722; *Citizens of Goleta Valley*, 52 Cal. 3d at 568.)

Response: The comment is a summary reference to the allegations made by the commenter's traffic consultant in Exhibit A of the comment letter. Specifically, the comment is an overall allegation about the sufficiency of the Draft EIR's transportation analysis, as a concluding statement to the six bullet points that precede the comment. Those bullet points are addressed in the Responses to Comments ATMP-PC035-7 through ATMP-PC035-12, and

the related claims by the commenter's traffic consultant asserted to substantiate those claims are addressed in Responses to Comments ATMP-PC035-51 through ATMP-PC035-58 below.

ATMP-PC035-14

Comment: C. THE DEIR VASTLY UNDERSTATES NOISE IMPACTS AND CUTS OFF IMPACT ANALYSIS IN 2028

An EIR must disclose and feasibly mitigate noise impacts. (See *Los Angeles Unified School District v. City of Los Angeles* (1997) 58 Cal.App.4th 1019.) These impacts must be explained with "plain language" and draw an explicit connection between increased exposures to their likely human-health effects (e.g., headaches, nuisance, etc.). (See CEQA Guidelines § 15140; see also *San Franciscans for Reasonable Growth v. City and County of San Francisco* (1987) 193 Cal.App.3d 1544, 1548; *Bakersfield Citizens*, 124 Cal.App.4th at 1219.) Furthermore, a lead agency may not ignore cumulative noise impacts by claiming an area is already heavily impacted by noise and, therefore, project-related additions would be insignificant. (See *Los Angeles Unified*, 58 Cal.App.4th at 1025.)

Here, as pointed out in the expert noise comment letter (attached hereto as Exhibit B), the DEIR's noise analysis contains several flaws that mask all potential impacts from the ATMP, which need to be mitigated to the maximum extent feasible. While this expert comment letter speaks for itself, Commenters highlighted the following findings made by the noise experts:

Response: Section 4.8 of the Draft EIR provides a comprehensive evaluation of potential impacts related to aircraft noise, roadway traffic noise, and construction noise, and includes the identification of feasible mitigation measures for significant impacts. Every effort has been made to present the analysis in understandable terms, as is the entirety of the section. The section begins with an explanation of the general characteristics of noise, an overview of noise descriptors, and a detailed discussion of the effects of noise on humans, all of which serve to help the reader better understand the technical aspects of the noise analysis. The section includes analyses of cumulative noise impacts. The analysis of cumulative noise impacts does not conclude that, because LAX is already heavily impacted by noise, Project-related additions would be insignificant, as inferred by the commenter. Regarding the commenter's reference to specific comments in "Exhibit B," which accompanies the comment letter. please see Responses to Comments ATMP-PC035-61 through ATMP-PC035-71 which address the March 15, 2021 noise review performed by RK Engineering Group, Inc. (i.e., Exhibit B of the comments submitted by Jordan Sisson, on behalf of Gideon Kracov, Attorney at Law).

ATMP-PC035-15

Comment: • The DEIR's noise analysis delivers contradictory statements and appears to dismiss the widely recognized fact that environmental noise affects human health. The California

Noise Control Act explicitly declares that excessive noise is a serious hazard to the public health and exposure to certain levels of noise can result in physiological and psychological damage.

Response: Please see Topical Response TR-ATMP-N-1 regarding health effects of noise.

ATMP-PC035-16

Comment: • The DEIR relies on unsubstantiated 29 decibel ("dBA") attenuation for classrooms, which is nine more than the widely accepted 20 dBA attenuation standard.

Response: The content of this comment is similar to comment ATMP-PC035-63; please refer to Response to Comment ATMP-PC035-63.

ATMP-PC035-17

Comment: • The DEIR fails to provide any data that the 28 schools identified within the applicable 65-dBA Community Noise Equivalent Level ("CNEL") contour around LAX would achieve this even the excessive 29 dBA noise attenuation.

Response: The content of this comment is similar to comment ATMP-PC035-63; please refer to Response to Comment ATMP-PC035-63.

ATMP-PC035-18

Comment: • The DEIR fails to provide maximum exterior noise levels ("Lmax") at exposed schools. This is critical in establishing the environmental setting of the school.

Response: The content of this comment is similar to comment ATMP-PC035-65; please refer to Response to Comment ATMP-PC035-65.

ATMP-PC035-19

Comment: • The DEIR fails to consider long-term noise impacts beyond 2028, even though LAX is planned to generate an additional 165,316 annual aircraft operations by 2045—a level that exceeds Burbank Airport operations from last year.

Response: Please see Topical Response TR-ATMP-G-3 regarding the reasons why 2028 is the appropriate horizon year for evaluating the impacts of the proposed Project. For the reasons explained therein, the Draft EIR's analysis of noise impacts is accurate and appropriate. In addition, Topical Response TR-ATMP-G-3 includes a general analysis of impacts beyond 2028; this analysis includes a discussion of noise impacts.

ATMP-PC035-20

Comment: • The DEIR's CNEL contour maps make no changes to the new terminal location, which is unlikely given that the Project is proposing new terminals in place of parking lots. This will impact nearby sensitive receptors (e.g., hotel patrons).

Response: The content of this comment is similar to comment ATMP-PC035-68; please refer to Response to Comment ATMP-PC035-68.

ATMP-PC035-21

Comment: • The DEIR fails to provide supporting documentation underlying its noise modeling that makes verification impossible and, thus, the conclusions are unsubstantiated

Response: The comment does not identify the supporting documentation that was purportedly missing from the Draft EIR. For this reason, it is not possible to provide a response to this comment. Because the introductory statement preceding the list of bulleted assertions, including this bullet, references the comment letter prepared by the commenter's noise consultant, it is believed that this comment pertains to the assertion presented in comment ATMP-PC035-69; please refer to Response to Comment ATMP-PC035-69.

ATMP-PC035-22

Comment: • The DEIR fails to use actual field measurements to determine construction noise impacts. This is particularly important when determining nighttime noise impacts.

Response: This comment is similar in content to comment ATMP-AL010-87; please refer to Response to Comment ATMP-AL010-87.

ATMP-PC035-23

Comment: • The DEIR does not include all reasonable feasible mitigation measures, such as a requirement for active construction noise monitoring at adjacent noise sensitive receptors anytime construction activities take place during nighttime hours. Active nighttime noise monitoring would help ensure actual construction noise levels (not based on computer models) do not exceed the nighttime noise standards in the City of Los Angeles or exceed existing ambient nighttime noise levels by more 5 dBA.

Response: The content of this comment is similar to comment ATMP-PC035-38; please refer to Response to Comment ATMP-PC035-38.

ATMP-PC035-24

Comment: In sum, as highlighted by the expert noise comment letter, the DEIR's noise analysis relies on missing relevant data, false assumptions, fails to draw explicit connections to real noise impacts—which ultimately minimizes noise impacts suggesting the area is already impacted—and thus violates CEQA. (See e.g., *Cleveland III*, 17 Cal.App.5th at 444-445; *San Joaquin Raptor/Wildlife Rescue Center*, 27 Cal.App.4th at 722; *San Franciscans for Reasonable Growth*, 193 Cal.App.3d at 1548; *Los Angeles Unified*, 58 Cal.App.4th at 1025.)

Response: The comment is a summary reference to the allegations made by the commenter's noise consultant in Exhibit B of the comment letter. Please see Responses to Comments ATMP-PC035-61 through ATMP-PC035-71 which address the March 15, 2021 noise review performed by RK Engineering Group, Inc.

ATMP-PC035-25

Comment: D. AIR QUALITY & GHG IMPACTS ARE UNDERESTIMATED IN THE DEIR WHICH FAILS TO SHOW ITS WORK

Air quality impacts and their concomitant impacts on human health must be studied in the CEQA document. (See *Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App.4th 1184, 1220 [quoting CEQA Guidelines § 15126.2(a)].) Courts have recognized the threat of toxic air contaminants ("TACs"), such as the carcinogenic threat posed by diesel particulate matter ("DPM") emitted from highway vehicles and particularly from heavy-duty trucks. (See *Cleveland III*, 17 Cal.App.5th at 438-439 [citing a growing body of scientific evidence, including several studies and estimates by California Air Resources Board, showing proximity to heavy traffic volumes is associated with increased respiratory symptoms, risk of heart and lung disease, elevated mortality rates, and that DPM resulted in 720 excess cancer cases per million in the San Diego region in 2000].) Hence, CEQA requires an agency to correlate transportation-related emissions to anticipated adverse health impacts. (Id. at 33; see also *Berkeley Keep Jets Over the Bay Com. v. Board of Port Comrs.* (2001) 91 Cal.App.4th 1344, 1367–1371.)

Response: The Draft EIR includes a detailed analysis of air quality impacts and their related impacts on human health in Sections 4.1.1 and 4.1.2 of the Draft EIR, respectively, with supporting information provided in Appendix C. With respect to the analysis of air quality impacts, the CEQA Protocol for Conducting an Air Quality Impact Analysis of Criteria Air Pollutants (Protocol) for the proposed Project is provided as Appendix C.8, Modeling Protocols, of the Draft EIR. This protocol describes the air quality impact analysis methods and assumptions that were used to generate Project-related pollutant emissions and concentrations estimates that were compared to appropriate significance thresholds under CEQA. The source types incorporated into the air quality analysis include:

- aircraft engines
- on-board auxiliary power units (APU)

- ground support equipment (GSE)
- ground access vehicles (passenger, employee, cargo)
- new terminal and concourse space/water heating and emergency generator units
- construction equipment and construction activities that generate air pollutant emissions

Section 3.4 of the protocol provides a more detailed description of ground access vehicles included in the analysis: "Ground access vehicles include on-road vehicle activity associated with passengers, air cargo, tenant operations, and airport employee (LAWA and tenant) travel to and from LAX. The vehicle fleet mix will be obtained from the ATMP traffic analysis prepared for the EIR, supplemented by information obtained from CARB's EMFAC model. The EMFAC model also provides criteria pollutant emission factors for engine exhaust, evaporative emissions, tire wear, and brake wear. The traffic analysis is expected to provide the number of vehicle trips on the design day (peak month, average day or PMAD). The traffic analysis is also expected to provide the vehicle miles traveled for trips that begin or end at the airport." As such, the air quality modeling conducted for the proposed Project, and the human health risk assessment which relies on the air quality modeling, incorporate transportation-related emissions. The evaluation and discussion of air quality and human health risk impacts is provided in Section 4.1 of the Draft EIR.

The methodology for evaluating impacts on human health is described in the Final Supplement 1 – Human Health Risk Assessment Methodology to the CEQA Protocol for Conducting an Air Quality Impact Analysis of Criteria Pollutants, which is included in Appendix C.8, Modeling Protocols, of the Draft EIR. The results of the analysis are documented in Appendix C.6, Human Health Risk Assessment Technical Report, of the Draft EIR. As stated in that appendix, "[t]he human health risk assessment (HHRA) presented in this technical appendix estimates cancer risks, chronic (long-term) non-cancer health hazards, and acute (short-term) non-cancer health hazards associated with exposure to toxic air contaminants (TAC) that would be emitted during construction and operation of the Los Angeles International Airport (LAX) Airfield and Terminal Modernization Project (proposed Project)." The Technical Report specifically mentions diesel particulate matter (DPM) in numerous places as a major source of total incremental cancer risks as well as a primary contributor to cumulative chronic non-cancer health hazards.

Regional air quality in the South Coast Air Basin is described in Section 4.1.1 of the Draft EIR and in Section 4.3 of Appendix C.6. The discussion identifies air pollutants of concern, regulatory standards for the protection of human health and the environment, and existing conditions in the region. Section 4.1.1.1 of the Draft EIR describes criteria pollutants that were evaluated in the air quality analysis and their general health effects. Sections 4.1.1.2.6, 4.1.1.5.1.1, and 4.1.1.5.2.1 address specific human health effects related to the proposed Project's significant air pollutant emissions.

The Multiple Air Toxics Exposure Study (MATES) conducted by the South Coast Air Quality Management District (SCAQMD) estimates cancer risk from TAC emissions throughout the South Coast Air Basin by conducting a comprehensive monitoring program, an updated emissions inventory of TAC, and a modeling effort to fully

characterize health risks for those living in the South Coast Air Basin.[1] The study found that the largest contributors to inhalation cancer risk are diesel engines and that current impacts associated with ongoing releases of TAC (e.g., from vehicle exhaust) and from sources of TAC from past and present projects in the region are substantial. Although the MATES-IV study is an appropriate estimate of present cumulative impacts of TAC emissions in the South Coast Air Basin, it does not, however, have sufficient resolution to determine the fractional contribution of current LAX operations to TAC in the air shed. The Draft EIR provides information concerning MATES and its role in the analysis. (Draft EIR, page 4.1.2-9.)

With respect to linking health effects in the surrounding communities to emissions from LAX, please see Response to Comment ATMP-PC028-4 regarding epidemiological studies that have been performed at other airports in large metropolitan areas to help determine whether individuals living near airports have a greater incidence of disease than populations living in other areas.

[1] South Coast Air Quality Management District, Multiple Air Toxics Exposure Study (MATES-IV) for the South Coast Air Basin, May 2015.

ATMP-PC035-26

Comment: So too, the California Supreme Court demands robust GHG analysis to assess a project's impact on climate change. Lead agencies must provide the contours of their logical argument and fill the analytical gap to support their significance determinations with substantial evidence and reasoned explanation. (See *Center for Biological Diversity v. Cal. Dept. of Fish and Wildlife* ("*Newhall Ranch*") (2015) 62 Cal.4th 204, 227.) Under CEQA Guidelines § 15064.4(b), acceptable methods include comparing the increased GHG emissions to (a) the pre-project baseline emissions, or (b) an adopted numeric threshold, or (c) determine the project's compliance with an officially adopted plan intended to reduce a project's cumulative contribution to the effects of climate change (e.g., climate action plans, GHG reduction plans). (Id. at 229-231.) While agencies enjoy discretion in the choice of methodology, CEQA requires the analysis be "based to the extent possible on scientific and factual data … stay[ing] in step with evolving scientific knowledge and state regulatory schemes."
(*Cleveland II*, 3 Cal.5th at 515, 519 [quoting CEQA Guidelines § 15064(b)].)

Moreover, merely because "a project is designed to meet high building efficiency and conservation standards … does not establish that its [GHG] emissions from transportation activities lack significant impacts." (*Newhall Ranch*, 62 Cal.4th at 229 [citing Natural Resources Agency].)[3] This concept is known as 'additionality' whereby GHG emission reductions otherwise required by law or regulation are appropriately considered part of the baseline and, pursuant to CEQA Guideline § 15064.4(b)(1), a new project's emission should be compared against that existing baseline.[4] Hence, a "project should not subsidize or take credit for emissions reductions which would have occurred regardless of the project."[5] In short, as observed by the Court, newer developments must be more GHG-efficient. (See *Newhall Ranch*, 62 Cal.4th at 226.)

As pointed out in the air quality/GHG comment letter (attached hereto as Exhibit C), the DEIR fails to adequately evaluate the Project's air quality, health risk, and GHG impacts. Findings on DEIR insufficiency include:

[3] See Final Statement of Reasons for Regulatory Action: Amendments to State CEQA Guidelines Addressing Analysis and Mitigation of GHG Emissions Pursuant to SB-97 ("Final Statement of Reasons") (Dec. 2009), p. 23 (while a Platinum LEED® rating may be relevant to emissions from a building's energy use, "that performance standard may not reveal sufficient information to evaluate transportation-related emissions associated with that proposed project"), http://resources.ca.gov/ceqa/docs/Final_Statement_of_Reasons.pdf.
[4] See Final Statement of Reasons, p. 89; see also California Air Pollution Control Officers Association ("CAPCOA") (Aug. 2010) Quantifying Greenhouse Gas Mitigation Measures, pp. 32, A3 ("in practice is that if there is a rule that requires, for example, increased energy efficiency in a new building, the project proponent cannot count that increased efficiency as a mitigation or credit unless the project goes beyond what the rule requires; and in that case, only the efficiency that is in excess of what is required can be counted."), http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf.
[5] Ibid., CAPCOA, at p. A-3.

Response: The Draft EIR includes a detailed analysis of impacts related to greenhouse gas (GHG) emissions in Section 4.4 of the Draft EIR, with supporting information provided in Appendix C. As described in Sections 4.4.2 and 4.4.4 of the Draft EIR, the methodology and significance thresholds used to assess the Project's impacts with respect to GHG emissions are based on acceptable methods and guidance. Specifically, Project-related GHG emissions were compared to baseline (2018) emissions, and the Project's potential to conflict with adopted plans, policies, or regulations adopted to reduce GHG emissions was evaluated. Furthermore, as documented in Section 4.4 and Appendix C, the analysis is supported by substantial evidence.

With respect to the assertion that the Draft EIR does not adequately evaluate the Project's air quality, health risk and GHG impacts, please refer to Response to Comment ATMP-PC035-32, and Responses to Comments ATMP-PC035-73, ATMP-PC035-74, ATMP-PC035-77, ATMP-PC035-78, and ATMP-PC035-79, which respond to comments provided in Exhibit C of this comment letter. Please also see Response to Comment ATMP-AL010-172 regarding GHG calculations for the individual stationary emissions categories. These responses demonstrate that the air quality, GHG, and human health risk analyses were adequately conducted.

ATMP-PC035-27

Comment: • The DEIR utilizes incomplete/unsubstantiated input parameters for its air quality and GHG modeling (e.g., underestimates land uses, failure to analyze construction trips, underestimates off-road construction equipment emissions, and underestimates

architectural coating emissions, etc.). As a result, neither the air quality, health risks, or GHG conclusions can be relied upon.

Response: The content of this comment is similar to comments ATMP-PC035-73, ATMP-PC035-74, and ATMP-AL010-172; please refer to Responses to Comments ATMP-PC035-73, ATMP-PC035-74, and ATMP-AL010-172. These responses demonstrate that the impact analysis was adequately conducted for air quality.

ATMP-PC035-28

Comment: • While admitting significant and unavoidable air quality/GHG emissions, the DEIR fails to consider and implement numerous feasible mitigation measures—as required under CEQA.

Response: Please see Topical Response TR-ATMP-AQ/GHG-1 regarding air quality and greenhouse gas mitigation measures for the LAX Airfield and Terminal Modernization Project. As explained therein, the Draft EIR considers and recommends all feasible mitigation measures.

ATMP-PC035-29

Comment: • The DEIR's Health Risk Assessment ("HRA") relies on incomplete/unsubstantiated modeling and, thus, DEIR's air model underestimates emissions associated with the Project's construction and operational activities. As a result, toxic air contaminates ("TAC") are underestimated.

Response: The content of this comment is similar to comment ATMP-PC035-77; please refer to Response to Comment ATMP-PC035-77.

ATMP-PC035-30

Comment: • The DEIR's HRA fails to disclose total emissions from operational sources and, thus, cannot be verified to ensure the HRA fully accounts for all sources.

Response: The content of this comment is similar to comment ATMP-PC035-78; please refer to Response to Comment ATMP-PC035-78.

ATMP-PC035-31

Comment: • The DEIR fails to analyze the ATMP's air quality and GHG impacts beyond 2028 and, thus, the DEIR fails to consider the long-term operational impacts of the Project.

Response: Please see Topical Response TR-ATMP-G-3 regarding the reasons why 2028 is the appropriate horizon year for evaluating the impacts of the proposed Project. For the reasons explained therein, the Draft EIR's analysis of air quality and GHG impacts is accurate and appropriate. In addition, Topical Response TR-ATMP-G-3 includes a general analysis of impacts beyond 2028; this analysis includes a discussion of impacts associated with GHG emissions.

ATMP-PC035-32

Comment: • The DEIR's GHG analysis fails to consider performance-based standards under the California Air Resources Board's ("CARB") 2017 Scoping Plan to ensure Project consistency with relevant GHG plans. For example, the DEIR estimates the Project would achieve 20.40 VMT per employee, which exceeds that anticipated under CARB's 2017 Scoping Plan.

Response: The proposed Project is evaluated for consistency with the 2017 Climate Change Scoping Plan on pages 4.4-35 and 4.4-38 in Section 4.4 of the Draft EIR. Each lead agency has broad discretion to select appropriate technical methods for analyzing GHG emissions, including analyzing consistency with plans and policies such as the 2017 Climate Change Scoping Plan. (See State CEQA Guidelines Section 15064.4(a).) As discussed below, the Draft EIR's approach to this analysis was reasonable, and the commenter's suggested approach is not appropriate for the proposed Project.

The 2017 Climate Change Scoping Plan establishes GHG emission reduction targets, and programs and policies to meet those targets. These targets, programs and policies apply State-wide. They are not designed to translate into "the percentage of reduction that would or should be required from individual projects." (*Center for Biological Diversity v. California Department of Fish and Wildlife* (2015) 62 Cal.4th 205, 225-226.) As such, it is not meaningful to provide an analysis of how Project-related vehicle miles traveled (VMT) specified in the comment would compare to goals in the 2017 Climate Change Scoping Plan because the VMT reduction in the 2017 Climate Change Scoping Plan is a statewide goal, and as the California Supreme Court has noted, there is insufficient evidentiary basis to translate that statewide goal into a significance threshold for a specific, local project. Rather, consistency with the 2017 Climate Change Scoping Plan was evaluated based on the proposed Project's ability to reduce GHG emissions, which is the overarching goal of the 2017 Climate Change Scoping Plan. Section 4.4 of the Draft EIR provides estimates of the proposed Project's GHG construction and operations emissions and describes (on pages 4.4-35 and 4.4-38) why those GHG emissions would not be consistent with the State's ability to achieve the GHG reduction targets established by the State under various Executive Orders. For these reasons, Section 4.4.5.2 of the Draft EIR states that these GHG impacts would be significant.

The performance standard cited in the comment – 19.83 VMT per employee as of 2030 – has not been endorsed by either SCAG or CARB as an appropriate efficiency metric for purposes of assessing consistency with the 2017 Climate Change Scoping Plan. The performance standards appear to have been fashioned by the commenter's consultant; the consultant appears to have based these standards on what may be County-wide population and VMT projections. These projections encompass the entire region and

encompass all uses within the region. The projections do not focus on a particular segment of the population (employees) at a particular location (LAX). For this reason, translating these ratios from one context to another is inappropriate. Neither SCAG nor any other agency has suggested that this calculation should be applied to employees at a particular facility. For additional information, please see Response to Comment ATMP-PC035-84.

ATMP-PC035-33

Comment: • The DEIR's GHG analysis fails to consider performance-based standards under the Southern California Association of Governments' ("SCAG") 2020 Regional Transportation Plan/Sustainable Communities Strategies ("RTP/SCS"). For example, the DEIR estimates 20.40 VMT per employee exceeds the 19.2 VMT anticipated in target year 2045 under SCAG's 2020 RTP/SCS.

Response: Please see Response to Comment ATMP-PC035-32 regarding how VMT reduction goals relate to evaluating consistency with GHG emission reduction plans. As with the 2017 Climate Change Scoping Plan, SCAG's 2020 RTP/SCS does not include mandates for individual projects. Therefore, it is not appropriate to compare the proposed Project's VMT to regional goals in the 2020 RTP/SCS. Please refer to Responses to Comments ATMP-PC035-32 and ATMP-PC035-84 for additional information on the invalidity of using these VMT data as targets.

ATMP-PC035-34

Comment: In sum, as highlighted by the expert comment letter, the DEIR's air quality and GHG analysis relies on faulty assumptions, missing scientific data, and analytical gaps showing the Project is meeting its additionality requirement—which ultimately minimizes emission impacts—and thus violates CEQA. (See e.g., *Citizens of Goleta Valley*, 52 Cal. 3d at 568; *Newhall Ranch*, 62 Cal.4th at 226-229; *Cleveland II*, 3 Cal.5th at 515, 519.)

Response: The comment is a summary reference to the allegations made by the commenter's air quality consultant in Exhibit C of the comment letter. Please see Responses to Comments ATMP-PC035-73 through ATMP-PC035-99. With regards to the concept referred to as "additionality," which is related to the greenhouse gas emissions (GHG) analysis, please see, in particular, Responses to Comments ATMP-PC035-32, ATMP-PC035-33, ATMP-PC035-74, ATMP-PC035-83, and ATMP-AL010-172.

ATMP-PC035-35

Comment: E. THE DEIR HAS AN IMPROPER AND INACCURATE PROJECT DESCRIPTION

An "'accurate, stable and finite project description is the *sine qua non* of an informative and legally sufficient EIR.'" (*San Joaquin Raptor Rescue Ctr. v. Cnty. of Merced* (2007) 149

Cal.App.4th 645, 654-655 [quoting *Cnty. of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 199] [emphasis in original].) As one court explained, "only through an accurate view of the project may affected outsiders and public decision-makers balance the proposal's benefit against its environmental cost, consider mitigation measures, assess the advantage of terminating the proposal (i.e., the 'no project' alternative), and weigh other alternatives in the balance." (*Citizens for a Sustainable Treasure Island v. City & Cnty. of San Francisco* (2014) 227 Cal.App.4th 1036, 1052.) Hence, an accurate project description is an "indispensable component of a valid EIR." (*Western Placer Citizens for an Agr. and Rural Env't v. Cnty. of Placer* (2006) 144 Cal.App.4th 890, 898.)

Here, a reoccurring criticism in the attached comment letters is the DEIR's narrow, self-serving timeline of assessing the Project's impacts. First, the DEIR anticipates that the current airport configuration is a "constraint on growth" starting in 2028. (DEIR, p. 2-17.) But the ATMP's improvements (e.g., extending Terminal 1 and constructing a new passenger terminal with additional gates) (DEIR, p. 2-1, 2-9, Fig. 2-1) are characterized as merely "modernization" of LAX to accommodate continued growth in airline passengers over "several decades" (DEIR, p. 2-18). This is internally inconsistent with the claim that the Project is not growth-inducing. The DEIR fails to: 1) explain how the anticipated growth at LAX was not already accounted for by the SCAG's 2020 RTP/SCS, which noted several modernization projects already approved and ongoing at LAX;[6] or 2) describe how the ATMP will not prematurely expand LAX's capacity that will lead to the airport maintaining or even significantly increasing its regional share of air travel—contrary to what SCAG anticipates (DEIR, Tbl. 2-1 [LAX's regional passenger share anticipated to drop from regional 76.75 % to 64.42 % from 2017 to 2045). In both scenarios, impacts will be more significant than those forecast in the 2020 RTP/SCS.

Second, and more fundamentally, the DEIR's impact analysis arbitrary limits its analysis to 2028 when project construction is to end. This ignores the impacts associated with nearly 45 million annual passengers ("MAP") anticipated post-2028. (DEIR, APP-B [110.8 MAP in 2028 to 155.6 MAP in year 2045].) Essentially, the DEIR ignores the entire operational and longer-term impacts of the Project (i.e., post-2028). (See e.g., DEIR, p. 4.1.1-34 & 36 [air impacts associated only for 2028 modeled].) For example, there is no explanation of how air emissions from this post-2028 growth will comport with the emissions anticipated for the air basin in a manner consistent with the Clean Air Act ("CAA") and applicable State Implementation Plan ("SIP"). This is a blatant abuse of discretion lacking in substantial evidence. A 'clearly inadequate or unsupported study is entitled to no judicial deference.'" (*Berkeley Keep Jets*, 91 Cal.App.4th at 1355.)

In sum, the DEIR's project description and truncated analysis is inaccurate and misleading, which distorts the public decisionmaking process—which violates CEQA. (See *Citizens for a Sustainable Treasure Island*, 227 Cal.App.4th at 1052.) To say post-2028 growth is limited without the Project (on the one hand), and then fail to analyze the impacts of post-2028 growth as an impact of the ATMP (on the other) is a major error. Furthermore, this truncated concept of the Project serves only to chop-up the full impacts of the ATMP, which also violates CEQA. (See e.g., *San Joaquin Raptor/Wildlife Rescue Center v. Cnty. of Stanislaus* (1994) 27 Cal.App.4th 713, 730 [held use of "truncated project concept" violated CEQA]; *Bozung v. LAFCO* (1975) 13 Cal.3d 263, 283-284 [CEQA mandates "that environmental considerations do not become submerged by

chopping a large project into many little ones—each with a minimal potential impact on the environment - which cumulatively may have disastrous consequences."].) A project's CEQA review must assess "the whole of an action" to ensure that all of the project's environmental impacts are considered. (CEQA Guidelines § 15378.) Before undertaking a project, the lead agency must assess the environmental impacts of all reasonably foreseeable phases of a project, and a public agency may not segment a large project into two or more smaller projects to mask serious environmental consequences or evade CEQA review. (See e.g., CEQA Guidelines § 15378(a); *McQueen v. Bd. of Supervisors* (1988) 202 Cal.App.3d 1136, 1146-47.)

[6] SCAG (2020) RTP/SCS, Aviation and Airport Ground Access Technical Report, p. 38 (noting several LAX projects), https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_aviation-and-airport-ground-access.pdf?1606001540.

Response: With respect to the commenter's assertions that the proposed Project is growth-inducing, please see Section 2.3.1.2.2 of the Draft EIR. As explained there, the annual activity forecast and regression analysis prepared by LAWA's aviation experts determined that aircraft operations would be the same in 2028 with or without the proposed Project, and that the proposed Project would not result in increased aviation and/or passenger activity levels or capacity at LAX. This analysis is supported by substantial evidence as documented in Appendix B.1 of the Draft EIR. Please Topical Response TR-ATMP-G-1 for further discussion of the validity of this forecast.

With respect to the comment that the Draft EIR should have analyzed impacts beyond 2028, please see Topical Response TR-ATMP-G-3 regarding the reasons why 2028 is the appropriate horizon year for evaluating the impacts of the proposed Project. In addition, Topical Response TR-ATMP-G-3 includes, for informational purposes, a general analysis of impacts beyond 2028. Please also see Responses to Comments ATMP-AL010-31 through ATMP-AL010-46 regarding allegations that implementation of the proposed Project would relieve capacity constraints and would induce additional growth at LAX beyond 2028.

The commenter states that the EIR's project description is inadequate or incomplete. The EIR identifies and describes all of the Project's components (Chapter 2 of the Draft EIR), including enabling projects that must be completed in order to accommodate the proposed Project (Section 2.5 of the Draft EIR). The project description includes all of the information required by CEQA. (state CEQA Guidelines, Section 15124.)

The comment that the Draft EIR has "chopped up" the proposed Project is incorrect. The Draft EIR appropriately analyzes the whole of the proposed Project, as well as cumulative impacts from reasonably foreseeable future projects, as required by CEQA.

Regarding how the air pollutant emissions associated with the proposed Project relate to the Federal Clean Air Act (CAA), a CAA general conformity evaluation was completed in conjunction with the Draft Environmental Assessment for the Project that is being processed through the Federal Aviation Administration pursuant to the National Environmental Policy Act. The Draft Environmental Assessment and Draft General Conformity Determination are available for review online at www.lawa.org/ATMP under

"Documents". As indicated in that document, the FAA proposes to conclude that the LAX Airfield and Terminal Modernization Project, as proposed, conforms to the purpose of the approved State Implementation Plan and is consistent with all applicable requirements.

ATMP-PC035-36

Comment: F. THE DEIR FAILS TO ADOPT ALL FEASIBLE MITIGATION

CEQA disfavors formulation of mitigation measures to post-approval studies with no performance standards to guide the mitigation. (See e.g., CEQA Guidelines § 15126.4(a)(1)(B); *Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App.4th 70, 92-93.) A lead agency may only defer the formulation of mitigation measures when it possesses "'meaningful information' reasonably justifying an expectation of compliance." (*Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 308 [quoting *No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d 68, 77 fn. 5]; see also *Sacramento Old City Association v. City Council of Sacramento* (1991) 229 Cal.App.3d 1011, 1028-29 [mitigation measures may be deferred only "for kinds of impacts for which mitigation is known to be feasible"].)

CEQA requires lead agencies to "craft mitigation measures that would satisfy enforceable performance criteria." (*City of Maywood v. Los Angeles Unified School Dist.* (2012) 208 Cal.App.4th 362, 407.) The imposition of specific, performance-based mitigation measures helps "[e]nsure the integrity of the process of decisionmaking by precluding stubborn problems or serious criticism from being swept under the rug." (*Concerned Citizens of Costa Mesa, Inc. v. 32nd Dist. Agricultural Assn.* (1986) 42 Cal.3d 929, 935; see also *Preserve Wild Santee v. City of Santee* (2012) 210 Cal.App.4th 260, 280–281.) Nor may a lead agency rely on mere compliance with existing laws or unrealistic mitigation measures of uncertain efficacy/feasibility. (See e.g., *Cleveland III*, 17 Cal.App.5th at 433 ["none of these measures had any probability of implementation, their inclusion in the EIR was illusory."]; *Californians for Alternatives to Toxics v. Department of Food and Agriculture* (2005) 136 Cal.App.4th 1, 17 ["[c]ompliance with the law is not enough to support a finding of no significant impact under the CEQA."]; *Kings County Farm Bureau*, 221 Cal.App.3d at 727 [finding groundwater purchase agreement inadequate mitigation because there was no evidence that replacement water was available].)

Here, another reoccurring criticism in the attached comment letters is the DEIR's failure to implement all feasible mitigation measures for admitted significant impacts. Here, the DEIR admits the ATMP will have significant, unmitigated air quality, GHG, noise, and transportation impacts. (DEIR, pp. 1-24 – 1-25.) However, the Project fails to impose all feasible mitigation measures—as confirmed by expert comments attached hereto, including numerous measures that the DEIR fails to show to be infeasible. These measures, as set forth in the expert comment letters, include:

Response: The commenter's statement that the Draft EIR "admits the ATMP will have significant, unmitigated air quality, GHG, noise, and transportation impacts" is incorrect. Mitigation

for air quality impacts is provided in Sections 4.1.1.5.1.2 and 4.1.1.5.2.2 of the Draft EIR; mitigation for greenhouse gas emissions is provided in Section 4.4.5.1.4 of the Draft EIR; mitigation for noise impacts is provided in Sections 4.7.1.5.1.3 and 4.7.3.5.2.2 of the Draft EIR; and mitigation for transportation impacts is identified in Section 4.8.5.2.2 of the Draft EIR. However, the Draft EIR acknowledges that, even with implementation of mitigation, impacts related to air quality, GHG emissions, aircraft noise, and transportation (specifically passenger VMT, induced VMT, and cumulative VMT impacts) would remain significant and would, therefore, be unavoidable.

With respect to the feasibility and/or applicability of the air quality and GHG mitigation measures identified by the commenter in comment ATMP-PC035-39 and comments ATMP-PC035-86 through ATMP-PC035-97, please see Topical Response TR-ATMP-AQ/GHG-1.

With respect to the commenter's statements in comments ATMP-PC035-38 and ATMP-PC035-71 that the Draft EIR does not include all reasonably foreseeable mitigation measures for reducing potential noise impacts, as identified in Section 4.7.3.5.2.3, with implementation of Mitigation Measures MM-CN (ATMP)-1, MM-CN (ATMP)-2, MM-CN (ATMP)-3, and MM-C (ATMP)-1, significant impacts associated with construction equipment noise impacts would be reduced to a level that is less than significant. Therefore, no additional mitigation is required. Please see Response to Comment ATMP-PC035-38 for additional discussion of the commenter's recommended mitigation.

With respect to the feasibility of the transportation mitigation measures identified by the commenter in comments ATMP-PC035-37 and ATMP-PC035-55, please see Topical Response TR-ATMP-T-2.

ATMP-PC035-37

Comment: TRAFFIC (Exhibit A, p. 4 [highlighted for your convenience]):

mitigation measures that can be included to reduce the VMT impact, including: provide additional off-site van pools and neighborhood shuttles for passengers, expand public transit services, provide public transit subsidies, provide bike-share and car-share programs, and encourage passengers (such as through advertisement) to use other modes of transportation getting to and from the airport. Additionally, there are other improvements that the project could do to improve pedestrian and bicycle infrastructure which has been shown to reduce VMT. Thus, additional mitigation measures should also include improvements to the pedestrian network, on-site traffic calming improvements, protected bike lanes, cycle tracks or separated bike trails, additional secured bike storage and end of trip facilities, and other non-automotive improvements to help reduce the projects affect upon VMT.

Response: The content of this comment is substantively the same as comment ATMP-PC035-55; please refer to Response to Comment ATMP-PC035-55.

ATMP-PC035-38

Comment: NOISE (Exhibit B, p. 5[highlighted for your convenience]):

Section 4.7.3.5.2.2, Mitigation Measures. The DEIR does not include all reasonably feasible mitigation measures for reducing potential noise impacts. The Construction Noise Control Plan should include a requirement for active construction noise monitoring at adjacent noise sensitive receptors anytime construction activities take place during nighttime hours. Active nighttime noise monitoring would help ensure actual construction noise levels (not based on computer models) do not exceed the nighttime noise standards in the City of Los Angeles or exceed existing ambient nighttime noise levels by more 5 dBA. The monitoring program should monitor and establish the adequate baseline noise levels for each receptor prior to commencing any activity. The monitoring program should also notify construction management personnel when noise levels approach and/or exceed the applicable thresholds. Construction activity should cease or be modified in order to ensure violations do not occur. Repeated violations should result in fines or other penalties.

Response: As indicated in the construction equipment noise evaluation methodology description presented in Section 4.7.3.2.2 of the Draft EIR, and as reflected in the impacts analysis presented in Section 4.7.3.5.2, construction equipment noise is evaluated in terms of Community Noise Equivalent Level (CNEL). As described in Sections 4.7.1.1.2 and 4.7.3.2.2. of the Draft EIR, CNEL represents the noise exposure level over a 24-hour period, whereby a noise penalty of approximately 5 dBA is applied to noise occurring between 7:00 p.m. and 10:00 p.m., and a noise penalty of 10 dBA is applied to noise occurring between 10:00 p.m. and 7:00 a.m. These penalties are applied to the time period when noise is considered more intrusive due to the types of activities that are likely to be affected, including sleep. As stated on page 4.7.1-5 of the Draft EIR, CNEL also accounts for the typically lower ambient noise levels during these hours. The construction equipment noise threshold of significance presented in Section 4.7.3.4.2 of the Draft EIR is based on a 5 dBA or more increase in the existing ambient exterior CNEL, which already accounts for the potential for construction-related noise at nighttime being more intrusive to nearby noise-sensitive receptors. As such, the commenter's suggestion to require active construction noise monitoring at adjacent noise-sensitive receptors anytime construction activities take place during nighttime hours is both unwarranted and contrary to the noise metric that is the basis for determining significant impacts. CNEL represents the overall 24-hour noise level with penalties applied during specific hours, and impacts and the mitigation of impacts are not determined based on only certain hours within that 24-hour period. Additionally, it should be noted that, as stated on page 4.7.3-7 of the Draft EIR, the daily CNEL values estimated for the construction activities and the staging area are very conservative because they assume that all construction equipment associated with each type construction activity or at the staging area would be in use at the same time, and that all construction equipment would be used in every hour of the day. Mitigation Measure MM-CN (ATMP)-1, Construction Noise Control Plans, requires site-specific analysis and a plan to reduce construction noise so that it does not exceed an increase of 5 dBA at noise-sensitive receptors. Additionally, to field-verify the effectiveness of construction noise attenuation measures, such as noise curtains, noise blankets, temporary sound walls, or their equivalent if needed, Mitigation Measure MM-CN (ATMP)-1 has been modified to

require that noise measurements be taken at the closest noise-sensitive receptors to confirm that the attenuated construction noise levels are less than 5 dBA over the existing exterior noise level. Please see Chapter F3, Corrections and Clarifications to the Draft EIR, regarding incorporation of these changes into the Final EIR.

ATMP-PC035-39

Comment: AIR QUALITY & GHGs (Exhibit C, pp. 12-18 [highlighted for your convenience]):

• Ground Support Equipment Conversion:
o Transition all baggage tugs, belt loaders, lifts, pushback tractors, and utility carts at SDIA that are owned and operated by airlines and their ground handling contractors to service aircraft, shall be transitioned to alternative fuels (i.e., electric, natural gas, renewable diesel, biodiesel).

• Renewable Electricity:
o Power project-related buildings with 100 percent renewable electricity.
• Clean Vehicle Parking:
o Designate 10 percent of new parking stalls for a combination of low-emitting, fuel-efficient, and carpool/vanpool vehicle.
• Electric Vehicle Chargers:
o Install electric vehicle charging ports at three percent of new parking stalls and another three percent would be "EVSE-ready."
• Ground Transportation Clean Vehicle Program:
o Implement a Commercial Ground Transportation Clean Vehicle Program.
• Bicycle Facilities:
o Install shower stalls and lockers, as well as covered bicycle storage for employees.
• Employee Parking Cash-Out Program:
o Implement a parking cash-out program for employees.

• Diesel engines, whether for off-road or on-road equipment, shall not be left idling for more than two minutes, at any location, except as provided in exceptions to the applicable state regulations regarding idling for off-road and on-road equipment (e.g., traffic conditions, safe operating conditions).
• Instruct construction workers and equipment operators on the maintenance and tuning of construction equipment and require that such workers and operators properly maintain and tune equipment in accordance with manufacturer specifications.
• Before starting onsite ground disturbance, demolition, or construction activities, submit a Construction Emissions Minimization Plan for review and approval. The plan shall include estimates of the construction timeline, with a description of each piece of off-road equipment required. The description may include, but is not limited to, equipment type, equipment manufacturer, engine model year, engine certification (Tier rating), horsepower, and expected fuel usage and hours of operation. For off-road

equipment using alternative fuels, the description shall also specify the type of alternative fuel being used. Make the Construction Emissions Minimization Plan available to the public for review onsite during working hours. Post at the construction site a legible and visible sign summarizing the plan. State that the public may ask to inspect the plan for the project at any time during working hours and shall explain how to request to inspect the plan. Post at least one copy of the sign in a visible location on each side of the construction site facing a public right-of-way.

Develop and implement a phased carbon management program that is consistent with the standards of ACI "Level 3+" Airport Carbon Accreditation Program, or equivalent, including calculation of annual carbon emissions from airport activity, identifying emissions reduction targets, tracking progress toward achieving effective carbon management procedures, and publishing an annual biennial carbon footprint report as a component of the Airport's broader environmental sustainability program.

CAPCOA's Quantifying Greenhouse Gas Mitigation Measures
Measures – Energy
Building Energy Use
Obtain Third-party HVAC Commissioning and Verification of Energy Savings
Lighting
Install Higher Efficacy Public Street and Area Lighting
Limit Outdoor Lighting Requirements
Alternative Energy Generation
Establish Onsite Renewable or Carbon-Neutral Energy Systems
Establish Onsite Renewable Energy System – Solar Power
Utilize a Combined Heat and Power System
Measures – Transportation
Land Use/Location
Increase Destination Accessibility
Increase Transit Accessibility
Orient Project Toward Non-Auto Corridor
Locate Project near Bike Path/Bike Lane
Neighborhood/Site Enhancements
Provide Pedestrian Network Improvements, such as:
- Compact, mixed-use communities
- Interconnected street network
- Narrower roadways and shorter block lengths
- Sidewalks
- Accessibility to transit and transit shelters
- Traffic calming measures and street trees
- Parks and public spaces
- Minimize pedestrian barriers

Provide Traffic Calming Measures, such as:
- Marked crosswalks
- Count-down signal timers
- Curb extensions
- Speed tables
- Raised crosswalks

- Raised intersections
- Median islands
- Tight corner radii
- Roundabouts or mini-circles
- On-street parking
- Planter strips with trees
- Chicanes/chokers

Incorporate Bike Lane Street Design (on-site)
Provide Bike Parking in Non-Residential Projects
Provide Electric Vehicle Parking
Commute Trip Reduction Programs
Implement Commute Trip Reduction (CTR) Program – Voluntary

- Carpooling encouragement
- Ride-matching assistance
- Preferential carpool parking
- Flexible work schedules for carpools
- Half time transportation coordinator
- Vanpool assistance
- Bicycle end-trip facilities (parking, showers and lockers)
- New employee orientation of trip reduction and alternative mode options
- Event promotions and publications
- Flexible work schedule for employees
- Transit subsidies
- Parking cash-out or priced parking
- Shuttles
- Emergency ride home

Implement Commute Trip Reduction (CTR) Program – Required Implementation/Monitoring

- Established performance standards (e.g. trip reduction requirements)
- Required implementation
- Regular monitoring and reporting

Implement Subsidized or Discounted Transit Program
Provide Ent of Trip Facilities, including:

- Showers
- Secure bicycle lockers
- Changing spaces

Implement Commute Trip Reduction Marketing, such as:

- New employee orientation of trip reduction and alternative mode options
- Event promotions
- Publications

Implement Preferential Parking Permit Program
Price Workplace Parking, such as:

- Explicitly charging for parking for its employees;
- Implementing above market rate pricing;
- Validating parking only for invited guests;
- Not providing employee parking and transportation allowances; and
- Educating employees about available alternatives.

Implement Employee Parking “Cash-Out”

Transit System Improvements

Transit System Improvements, including:

• Grade-separated right-of-way, including bus only lanes (for buses, emergency vehicles, and sometimes taxis), and other Transit Priority measures. Some systems use guideways which automatically steer the bus on portions of the route.

• Frequent, high-capacity service

• High-quality vehicles that are easy to board, quiet, clean, and comfortable to ride.

• Pre-paid fare collection to minimize boarding delays.

• Integrated fare systems, allowing free or discounted transfers between routes and modes.

• Convenient user information and marketing programs.

• High quality bus stations with Transit Oriented Development in nearby areas.

• Modal integration, with BRT service coordinated with walking and cycling facilities, taxi services, intercity bus, rail transit, and other transportation services.

Implement Transit Access Improvements, such as:

• Sidewalk/crosswalk safety enhancements

• Bus shelter improvements

Expand Transit Network

Increase Transit Service Frequency/Speed

Provide Bike Parking Near Transit

Provide Local Shuttles

Road Pricing/Management

Implement Area or Cordon Pricing

Improve Traffic Flow, such as:

• Signalization improvements to reduce delay;

• Incident management to increase response time to breakdowns and collisions;

• Intelligent Transportation Systems (ITS) to provide real-time information regarding road conditions and directions; and

• Speed management to reduce high free-flow speeds.

Required Project Contributions to Transportation Infrastructure Improvement Projects

Vehicles

Utilize Alternative Fueled Vehicles, such as:

• Biodiesel (B20)

• Liquefied Natural Gas (LNG)

• Compressed Natural Gas (CNG)

Measures – Water

Water Supply

Use Gray Water

Use Locally Sourced Water Supply

Water Use

Adopt a Water Conservation strategy

Design Water-Efficient Landscapes (see California Department of Water Resources Model Water Efficient Landscape Ordinance), such as:

• Planting vegetation with minimal water needs, such as native species;

• Choosing vegetation appropriate for the climate of the project site;

• Choosing complimentary plants with similar water needs or which can provide each other with shade and/or water.

Plant Native Trees and Vegetation

Measures – Vegetation

Vegetation

Urban Tree Planting

Create New Vegetated Open Space

Measures – Construction

Construction

Use Alternative Fuels for Construction Equipment

Urban Tree Planting

Use Electric and Hybrid Construction Equipment

Limit Construction Equipment Idling Beyond Regulation Requirements

Institute a Heavy-Duty Off-Road Vehicle Plan, including:

• Construction vehicle inventory tracking system;

• Requiring hour meters on equipment;

• Document the serial number, horsepower, manufacture age, fuel, etc. of all onsite equipment; and

• Daily logging of the operating hours of the equipment.

Implement a Construction Vehicle Inventory Tracking System

Measures – Miscellaneous

Miscellaneous

Establish a Carbon Sequestration Project, such as:

• Geologic sequestration or carbon capture and storage techniques, in which CO2 from point sources is captured and injected underground;

• Terrestrial sequestration in which ecosystems are established or preserved to serve as CO2 sinks;

• Novel techniques involving advanced chemical or biological pathways; or

• Technologies yet to be discovered.

Establish Off-Site Mitigation

Use Local and Sustainable Building Materials

Require Environmentally Responsible Purchasing, such as:

• Purchasing products with sustainable packaging;

• Purchasing post-consumer recycled copier paper, paper towels, and stationary;

• Purchasing and stocking communal kitchens with reusable dishes and utensils;

• Choosing sustainable cleaning supplies;

• Leasing equipment from manufacturers who will recycle the components at their end of life;

• Choosing ENERGY STAR appliances and Water Sense-certified water fixtures;

• Choosing electronic appliances with built in sleep-mode timers;

• Purchasing 'green power' (e.g. electricity generated from renewable or hydropower) from the utility; and

• Choosing locally-made and distributed products.

Response: This comment lists the same mitigation measures identified in comments ATMP-PC035-86 through ATMP-PC035-97, which are each addressed in Topical Response TR-ATMP-AQ/GHG-1. Please refer to Topical Response TR-ATMP-AQ/GHG-1.

ATMP-PC035-40

Comment: G. THE DEIR FAILS TO IDENTIFY OVERRIDING CONSIDERATIONS

The DEIR should identify facts relating to a CEQA-compliant statement of overriding considerations. (See *Lawler v. City of Redding* (1992) 7 Cal.App.4th 778 [vacating city's approval of a sports facility on city-owned land in an unincorporated area until adopting measures to sufficiently mitigate noise impacts].) When approving a project that will have significant environmental impacts not fully mitigated, a lead agency must adopt a "statement of overriding considerations" finding that the project's benefits outweigh its environmental harm. (Pub. Res. Code § 21081(b); see also CEQA Guidelines § 15043; *Sierra Club v. Contra Costa County* (1992) 10 Cal.App.4th 1212, 1222.) An overriding statement expresses the larger, more general reasons for approving the project, such as the need to create new jobs, provide housing, generate taxes, and the like. (See *Concerned Citizens of S. Central LA v. Los Angeles Unif. Sch. Dist.* (1994) 24 Cal.App.4th 826, 847.) It must fully inform and disclose the specific benefits expected to outweigh environmental impacts, supported by substantial evidence. (See CEQA Guidelines §§ 15043(b) & 15093(b); see also *Sierra Club*, 10 Cal.App.4th at 1223.) However, an agency may adopt a statement of overriding considerations only after it has imposed all feasible mitigation measures to reduce a project's impact to less than significant levels. (See CEQA Guidelines §§ 15091 & 15126.4.) Hence, decisionmakers may not approve a project when feasible mitigation measures can substantially lessen or avoid such impacts. (See e.g., Pub. Res. Code § 21002; CEQA Guidelines § 15092(b)(2).) So too, additional overriding considerations may be necessary to adequately override those additional impacts that the DEIR underestimates.

To the extent that overriding considerations are needed, key among the findings that the lead agency must make is that:

"Specific economic, legal, social, technological, or other considerations, including the provision of *employment opportunities for highly trained workers*, make infeasible the mitigation measures or alternatives identified in the environmental impact report … [and that those] benefits of the project outweigh the significant effects on the environment." (Pub. Res. Code § 21081(a)(3) & (b), emphasis added.)

Here, the DEIR fails to identify significant impacts and/or incorporate feasible mitigation measures. Nor does the DEIR identify any overriding considerations. To the extent the City considers approving the Project with significant environmental impacts, the City should consider the overriding benefits to service/hospitality workers near LAX and the Airport Hospitality Enhancement Zone ("AHEZ") that will suffer the brunt of significant air quality, GHG, and other impacts caused by the ATMP development. Considerations should include, at a minimum: a) the number of construction and operational jobs that will be for "highly trained workers" and what the likely salary and wage ranges of these jobs will be; and b) to what extent this Project will ensure better permanent service jobs for contracted airline service/hospitality workers.

Response: Please see Response to Comment ATMP-PC035-1 regarding the Statement of Overriding Considerations that LAWA will prepare for the proposed Project. As with the Statement

of Overriding Considerations, LAWA will prepare findings in accordance with Section 21081 of the Public Resources Code and Section 15091 of the State CEQA Guidelines. As required, these findings will be made available prior to consideration of the proposed Project by the Board of Airport Commissioners. Section 21081(a)(3) of the Public Resources Code does not require an EIR to identify significant impacts on employment opportunities for highly trained workers or to incorporate mitigation measures or other benefits for workers. Nor does Section 21081(a)(3) require an EIR to consider the number of construction or operational jobs for highly trained workers, or the salary of those jobs. To the contrary, under CEQA, "[e]conomic and social changes resulting from a project shall not be treated as significant effects on the environment" (Section 15064(e) of the State CEQA Guidelines). Rather, Section 21081(a)(3) allows a public agency to consider the provision of employment opportunities for highly trained workers as a reason to find that a specific mitigation measure or alternative identified in the EIR is infeasible.

With regard to the commenter's assertion that the Draft EIR fails to identify significant impacts and/or incorporate feasible mitigation measures, significant impacts of the proposed Project are identified in Chapter 4 of the Draft EIR and are summarized in Section 1.4 and Section 5.2; significant and unavoidable impacts are summarized in Section 1.4.1 and Section 6.1. Feasible mitigation measures to address significant impacts are also identified in Chapter 4. Specifically, significant impacts to air quality, and related mitigation measures, are identified in Section 4.1.1; significant impacts related to greenhouse gas emissions, and related mitigation measures, are identified in Section 4.4; significant impacts to noise, and related mitigation measures, are identified in Section 4.7; and significant impacts related to transportation, and related mitigation measures, are identified in Section 4.8. The significant unavoidable impacts of the proposed Project will be addressed in the CEQA Findings and Statement of Overriding Considerations.

ATMP-PC035-41

Comment: Furthermore, the City/LAWA should consider the following that ultimately serves to reduce the Project's significant VMT, GHG, and mobile-emissions impacts:

- Expanded public transit service from neighborhoods where service/hospitality workers live to LAX/AHEZ at times needed for all shifts of work;
- Free or reduced transit passes for LAX/AHEZ workers;
- Free or reduced parking at LAX/AHEZ for workers who carpool;

Response: Mitigation for impacts related to vehicle miles traveled (VMT) is addressed in Section 4.8.5.2.2 of the Draft EIR. In addition, please see Topical Response TR-ATMP-T-2 regarding mitigation for transportation impacts and Topical Response TR-ATMP-AQ/GHG-1 regarding mitigation for GHG and mobile emissions impacts. The Draft EIR includes Mitigation Measure MM-T (ATMP)-1, which is a broad mitigation measure that includes a number of VMT reduction programs. As part of this mitigation measure, LAWA would expand existing pilot programs that offer micro-transit shuttles for employees living in the airport area to full programs with expanded service areas. Another program

included in the mitigation measure is the expansion of LAWA's existing rideshare program, which currently serves LAWA employees, to all LAX workers. With respect to reduced transit passes for LAX/AHEZ workers, please see Table 1 in Topical Response TR-ATMP-T-2. Expanded benefits for workers who carpool is identified as an additional potential component of Mitigation Measure MM-T (ATMP)-1, which would be considered for implementation if needed to achieve the required reduction in employment VMT. With implementation of Mitigation Measure MM-T (ATMP)-1, the proposed Project's impact on employment VMT would be less than significant. Please see Topical Response TR-ATMP-T-2 for further discussion of this issue.

ATMP-PC035-42

Comment: • Quality job creation that expands housing opportunities near LAX/AHEZ for employees via:

a. Operational jobs that provide real living wages able to afford an apartment in Los Angeles, which housing experts estimate must be $33/hour in 2015[7]—LAX's current living wage of $16.50/hour is not enough even when healthcare costs are not considered. This is necessary for workers to be able to afford to live near LAX/AHEZ and not commute longer distance that increase VMT and mobile-emissions;

and/or

b. Airlines contribute to an affordable housing fund directly for service workers living in neighborhoods surrounding the airport that will promote employees living closer to LAX/AHEZ;

and/or

c. Operational jobs that provide real healthcare, which must be increased from the current LAX living wave law requiring merely $5.55/hour for healthcare.[8]

[7] Southern California Public Radio (89.3KPPC) (1/15/15) LA Residents Need To Make $33 An Hour To Afford The Average Apartment ("You need to earn at least $33 an hour — $68,640 a year — to be able to afford the average apartment in Los Angeles County, according to Matt Schwartz, president and chief executive of the California Housing Partnership, which advocates for affordable housing."), https://www.scpr.org/blogs/economy/2015/01/15/17806/la-residents-need-to-make-34-an-hour-to-afford-ave/.
[8] California USSW service employee's health and welfare trust fund has been quoted healthcare costs for a family Kaiser plan for LAX employees that cost up to $9.40/hour for family coverage.

Response: The comment is noted and will be included in the Final EIR for consideration by the decision-makers prior to taking any action on the LAX Airfield and Terminal Modernization Project. Please see Response to Comment ATMP-PC035-2 regarding economic considerations, including jobs and affordable housing. As noted in Response

to Comment ATMP-PC035-2, the City of Los Angeles and LAWA have a number of policies and programs aimed at improving the economic benefit of jobs linked to LAX projects. However, LAWA does not have any authority or control over housing and does not have the authority to require airlines to contribute to an affordable housing fund as suggested by the commenter. Please also see Table 1 of Topical Response TR-ATMP-T-2.

ATMP-PC035-43

Comment: H. DEIR RECIRCULATION IS REQUIRED

CEQA requires a lead agency to recirculate an EIR when significant new information is added to the EIR following public review but before certification. (See Pub. Res. Code § 21092.1.) New information is significant if "the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project" including, for example, "a disclosure showing that … [a] new significant environmental impact would result from the project." (CEQA Guidelines § 15088.5.) Here, recirculation is required because the DEIR fails to analyze the Project's real impacts (i.e., post-2028) and fails to implement all feasible mitigation measures and/or demonstrate proposed mitigation measures are infeasible (to name a few of the fatal flaws of this DEIR). Neither the public nor decisionmakers can meaningfully comment and consider the Project's impacts absent this information and, thus, a recirculated DEIR that addresses the issues discussed herein is necessary.

Response: The comment is noted and will be included in the Final EIR for consideration by the decision-makers prior to taking any action on the LAX Airfield and Terminal Modernization Project. Please see Topical Response TR-ATMP-G-3 regarding the assessment of future environmental effects associated with the LAX Airfield and Terminal Modernization Project beyond the buildout year of 2028. Please see Topical Response TR-ATMP-AQ/GHG-1 regarding the feasibility of the air quality and GHG mitigation measures identified by the commenter in comment ATMP-PC035-39 and comments ATMP-PC035-86 through ATMP-PC035-97; Topical Response TR-ATMP-T-2 regarding the feasibility of the transportation mitigation measures identified by the commenter in comments ATMP-PC035-37 and ATMP-PC035-55; and Response to Comment ATMP-PC035-38 regarding the need for and appropriateness of the mitigation recommended by the commenter in comments ATMP-PC035-38 and ATMP-PC035-71.

The LAX Airfield and Terminal Modernization Project Draft EIR is complete, adequate, and meets the requirements of CEQA. In preparing the Final EIR for the proposed Project, LAWA has reviewed all of the comments received, and has carefully considered the responses to these comments and other information provided in the LAX Airfield and Terminal Modernization Project Final EIR. None of the information provided in the Final EIR meets the criteria for recirculation of an EIR as outlined in Section 15088.5 of the State CEQA Guidelines.

ATMP-PC035-44

Comment: III. CONCLUSION

In closing, Commenters urge the City/LAWA to stay all action on the Project until the issues discussed herein are resolved in a recirculated, CEQA-compliant DEIR. Faults in the DEIR include incomplete analysis and mitigation of traffic, air quality, noise, GHG impacts, an inadequate project description, and the absence of overriding considerations.

Response: The comment is noted and will be included in the Final EIR for consideration by the decision-makers prior to taking any action on the LAX Airfield and Terminal Modernization Project.

The commenter's claims regarding the traffic analysis and mitigation are raised in comments ATMP-PC035-7 through ATMP-PC035-13 and in comment ATMP-PC035-37, and in the related claims by the commenter's consultant in comments ATMP-PC035-51 through ATMP-PC035-58. Please see the responses to these comments as well as Response to Comment ATMP-AL010-133 and Topical Responses TR-ATMP-G-3, TR-ATMP-T-1, and TR-ATMP-T-2.

The commenter's claims regarding the air quality and greenhouse gas (GHG) emissions analyses and mitigation are raised in comments ATMP-PC035-25 through ATMP-PC035-34 and comment ATMP-PC035-39, and in the related claims by the commenter's consultant in comments ATMP-PC035-72 through ATMP-PC035-76 and ATMP-PC035-80 through ATMP-PC035-99. Please see the responses to these comments as well as Response to Comment ATMP-AL010-172, and Topical Responses TR-ATMP-G-3 and TR-ATMP-AQ/GHG-1.

The commenter's claims regarding the noise analysis and mitigation are raised in comments ATMP-PC035-14 through ATMP-PC035-24 and comment ATMP-PC035-38, and in the related claims by the commenter's consultant in comments ATMP-PC035-60 through ATMP-PC035-71. Please see the responses to these comments as well as Responses to Comments ATMP-AL010-72, ATMP-AL010-86, and ATMP-AL010-87, and Topical Responses TR-ATMP-G-3 and TR-ATMP-N-1.

The commenter's claims regarding the project description are raised in comment ATMP-PC035-35; please see the Response to Comment ATMP-PC035-35 and Topical Response TR-ATMP-G-3. The commenter's claims regarding the statement of overriding considerations are raised in comment ATMP-PC035-40; please see Response to Comment ATMP-PC035-40.

As reflected in the responses identified above, the LAX Airfield and Terminal Modernization Project Draft EIR is complete, adequate, and meets the requirements of CEQA. In preparing the Final EIR for the proposed Project, LAWA has reviewed all of the comments received, and has carefully considered the responses to these comments and other information provided in the LAX Airfield and Terminal Modernization Project Final EIR. None of the information provided in the Final EIR meets the criteria for recirculation of an EIR as outlined in Section 15088.5 of the State CEQA Guidelines.

ATMP-PC035-45

Comment: This Project can and must do better. Rising inequality threatens Los Angeles' prosperity. There are serious challenges in the region concerning affordable housing and living wage jobs — and COVID has made things even more difficult for our members. USWW and Local 11 work to stem this rising tide of inequality and fight to make our region a place of opportunity for all—a place where their members can work and afford to live. LAWA must better consider to what extent this Project will ensure better permanent service jobs for airline service workers who will feel the significant air quality, GHG, and other impacts caused by the Project. True community and worker benefits are needed if this Project is to be approved.

Response: The content of this comment is substantively the same as comment ATMP-PC035-2; please refer to Response to Comment ATMP-PC035-2.

ATMP-PC035-46

Comment: On behalf of Commenters, this Office requests, to the extent not already on the notice list, all notices of CEQA actions and any approvals, determinations, or public hearings to be held on the Project under state or local law requiring local agencies to mail such notices to any person who has filed a written request for them. (Pub. Res. Code §§ 21092.2, 21167(f) and Gov. Code § 65092 and LAMC § 197.01.F.) Please send notice by electronic and regular mail to: Jordan R. Sisson, Esq., 801 S. Grand Avenue, 11th Fl., Los Angeles, CA 90017, jordan@gideonlaw.net.

Response: This comment is noted. The commenter's physical mailing address and electronic mailing address have been added to the Project mailing list to receive future notices related to the proposed Project.

ATMP-PC035-47

Comment: Thank you for your consideration of these comments. Commenters reserve the right to supplement these comments at future hearings and proceedings for this Project. (See *Galante Vineyards v. Monterey Peninsula Water Management Dist.* (1997) 60 Cal.App.4th 1109, 1120 [CEQA litigation not limited only to claims made during EIR comment period].) We ask that this letter and attachments are placed in the administrative record for the Project.

Response: This comment is noted. The comment letter, including attachments, will be included in the administrative record for the Project.

ATMP-PC035-48

Comment: RK ENGINEERING GROUP, INC. (RK) is pleased to provide this review of the LAX Airfield and Terminal Modernization Project Draft Environmental Impact Report (DEIR), dated October 2020, with respect to transportation impacts. The project consists of airfield, terminal and landside improvements to the Los Angeles International Airport (LAX).

Los Angeles World Airport (LAWA) proposes to implement airfield, terminal and landside roadway improvements at LAX. The proposed project consists of several primary elements, (including airfield improvements) that would enhance operational management and safety within the airfield, new terminal facilities to upgrade passenger processing capabilities and enhance the passenger experience, and an improved system of the roadways to better access the Central Terminal Area (CTA) and new facilities while reducing congestion. It is anticipated that the project construction would occur from Year 2021 to Year 2028 (when full completion of the project is expected).

The project is an extensive multi-phase construction project which will occur over several years (2021 to 2028) and has the potential of impacting the public roadway and transportation system both during construction and with future operation of the expanded facilities.

Response: The comment is an introduction to the March 15, 2021 transportation review performed by RK Engineering Group, Inc. (Exhibit A of the comments submitted by Jordan Sisson, on behalf of Gideon Kracov, Attorney at Law) and includes a general summary of project description information contained in Chapter 2 of the Draft EIR. Regarding the commenter's specific comments pertaining to the proposed Project's effects on the public roadway and transportation system during construction and operations, please see Responses to Comments ATMP-PC035-49 through ATMP-PC035-59 below.

ATMP-PC035-49

Comment: RK has reviewed the DEIR and its appendices with respect to the proposed project and the impact to transportation systems in the vicinity of the site. The Transportation Impact Analysis primarily focused on the project's Vehicle Miles Traveled (VMT) impacts, consistency with the local and regional transportation/land use plans, geometric design hazards and freeway safety analysis in the area. A traditional Level of Service (LOS) analysis of the roadway systems in the study area was not provided as part of the DEIR or its appendices.

Response: Please see Topical Response TR-ATMP-T-1 regarding the assessment of transportation effects associated with the LAX Airfield and Terminal Modernization Project that are not subject to CEQA. As noted therein, the Draft EIR was not required to include a Level of Service ("LOS") analysis. However, LAWA completed a Non-CEQA Transportation Assessment in accordance with the City of Los Angeles Transportation Assessment Guidelines in April 2021. The Non-CEQA Transportation Assessment is available at https://www.lawa.org/atmp/documents.

ATMP-PC035-50

Comment: RK has identified several deficiencies with respect to the assessment of the impacts to the public roadway system. These deficiencies include failing to analyze the full extent of the project's long term impact and a lack of meaningful analysis of the project's impact on the adequacy of existing transportation infrastructure within the study area to accommodate the increased throughput capacity and efficiency of the LAX facilities. The DEIR also does not consider all reasonably feasible mitigation measures for reducing potential impacts. Furthermore, the construction impacts of the project, which are expected to last until Year 2028 are glossed over, and the vehicular impacts during construction with respect to roadway, intersection and parking have not been analyzed in the DEIR.

Response: The "deficiencies" alleged by the commenter are subsequently presented individually in comments ATMP-PC035-51 through ATMP-PC035-58; please see Responses to Comments ATMP-PC035-51 through ATMP-PC035-58 below.

ATMP-PC035-51

Comment: Comments

The following comments are offered with respect to the transportation impacts of the LAX Airfield and Terminal Modernization Project DEIR:

1. The DEIR did not assess the Level of Service (LOS) impacts to the roadways and intersections in the project study area. The Notice of Preparation (NOP) for the DEIR was dated April 2019, and at that time, the Los Angeles Department of Transportation (LADOT) Traffic Study Guidelines dated January 2016 were in effect. Even though the DEIR is dated October 2020, the guidelines in affect at the time of the NOP should have been utilized. Those guidelines require a detailed LOS analysis of those intersections where the project would have a potential impact upon the existing and future levels of service. While RK acknowledges that transportation impacts under CEQA should now generally be based on VMT, leaving out the LOS analysis presents incomplete information as to the actual impact of this project on the local and area-wide roadway system. The expected impacts of the increased employment and passenger activity at LAX between now and Year 2028 when the project is completed must be associated with the project.

Response: Please see Topical Response TR-ATMP-T-1 regarding the assessment of transportation effects associated with the LAX Airfield and Terminal Modernization Project that are not subject to CEQA, which was conducted in accordance with the City of Los Angeles Transportation Assessment Guidelines.

As the commenter notes, the Notice of Preparation for the proposed Project was issued in April 2019. At that time, the State CEQA Guidelines had been amended to provide that a project's impact on automobile delay was no longer considered an environmental

impact for purposes of CEQA. (State CEQA Guidelines Section 15064.3 (a).) A lead agency could elect to be governed by these provisions immediately upon their adoption, which occurred in December 2018. (State CEQA Guidelines Section 15064.3 (c).) Thus, notwithstanding the publication date of the Notice of Preparation, LAWA had discretion to focus on vehicle miles traveled, rather than vehicle delay, as the appropriate metric to analyze transportation impacts. In addition, the shift from level of service (delay) analysis to vehicle miles traveled became mandatory in July 2020. (State CEQA Guidelines Section 15064.3 (c).) The Draft EIR was issued in October 2020. By that time, LADOT had amended its guidelines to be consistent with the mandatory requirements of State CEQA Guidelines Section 15064.3. The commenter's statement that LAWA should have continued to use level-of-service analysis as the appropriate metric is therefore legally incorrect. (See *Citizens for Positive Growth & Preservation v. City of Sacramento* (2019) 43 Cal.App.5th 609.) The commenter's suggested approach would therefore be inconsistent with CEQA.

ATMP-PC035-52

Comment: 2. The DEIR does not disclose the full extent of the project's transportation impact by failing to analyze long-term conditions (i.e. year 2045). The transportation analysis is based on project impacts in year 2028, yet as discussed in Section 2.3.1.2.2, and supported by the data in Appendix B, "airfield congestion is not projected to be a constraint on growth until after year 2028". Hence, one of the primary purposes of the project is to reduce potential constraints on growth after year 2028. This is evident when looking at the Activity Forecast Report, provided in Appendix B, Table 3-5, which shows that the total unconstrained annual passengers at LAX will grow from 110.8 Million Annual Passengers in year 2028 to 155.6 Million Annual Passengers in year 2045. The result is that the project would cause a substantially greater increase in VMT and traffic generation, compared to "without" project conditions, after year 2028. Yet the DEIR conceals the long term impacts of the project by only analyzing near-term conditions in year 2028. The final EIR should address all reasonably foreseeable long term impacts (i.e. year 2045) from the project, as is reported elsewhere in the DEIR.

Response: Please see Topical Response TR-ATMP-G-3 regarding the bases for why 2028 is the appropriate horizon year for evaluating the impacts of the proposed Project. Please also see Responses to Comments ATMP-AL010-31 through ATMP-AL010-46 regarding allegations that implementation of the proposed Project would relieve capacity constraints and would induce additional growth at LAX beyond 2028.

With respect to the commenter's assertions that proposed Project would cause a substantially greater increase in VMT and traffic generation, compared to "without" project conditions, after year 2028, please see Section 2.3.1.2.2 of the Draft EIR. As explained there, the annual activity forecast and regression analysis prepared by LAWA's aviation experts determined that aircraft operations would be the same in 2028 with or without the proposed Project, and that the proposed Project would not result in increased aviation and/or passenger activity levels or capacity at LAX. This analysis is supported by substantial evidence as documented in Appendix B.1 of the Draft EIR.

Please Topical Response TR-ATMP-G-1 for further discussion of the validity of this forecast.

ATMP-PC035-53

Comment: 3. The total trip generation without the proposed project will be 399,752 daily trips, as shown in Table 4.8-4, whereas with the total trip generation with the project is only projected to be 407,942 daily trips, as shown in Table 4.8-8. This is only an increase of 8,190 daily trips, which calculates to be only a 2% increase in daily trips. Since the existing number of daily trips is noted as 316,128 daily trips, this indicates that the growth in daily trips with the project from Existing Conditions to the With Project Conditions (Year 2028) is 91,814 daily trips, however, the project is only responsible for 8,190 of those trips which is less than 10% of the total projected growth. As discussed in comment #2 above, the project trip generation would likely be substantially higher in year 2045 than year 2028. Failing to disclose the full extent of project trip generation and project VMT results in underreported impacts.

Response: The Proposed Project trip generation and VMT forecast for year 2028 is based on the Project's design day air traffic and passenger throughputs plus the employee trips plus trips related to cargo operation. As stated in DEIR Chapter 2, Description of the Proposed Project, the proposed project does not generate any new passenger- or cargo-related trips. The commenter correctly notes that the Proposed Project would only add 8,190 new trips relative to Projected Future Conditions Baseline (2028), which are generated by the 4,700 new employees. As noted in the DEIR chapter 2, The passenger activity level of 110.8 MAP projected for LAX in 2028 is the same for both Projected Future Conditions Baseline (2028) and Proposed Project (2028). The Proposed Project does not increase the level of passenger activity.

Regarding the commenter's assertion that project trip generation would likely be substantially higher in 2045 than year 2028, that claim is made in the earlier comment (i.e., comment ATMP-PC035-52). Please see Response to Comment ATMP-PC035-52.

ATMP-PC035-54

Comment: 4. The DEIR does not analyze and disclose the full impact of the project's net effect on VMT. Threshold 4.8-3 incorrectly evaluates the VMT from "passengers" only. Instead, Threshold 4.8-3 should be based on the total project service population VMT, including passengers, employees and other trips. For regional serving uses, the City of Los Angeles Transportation Assessment Guidelines require that regional serving projects should be evaluated to determine whether the project would result in a net increase in "total" VMT. By not evaluating VMT impacts from the entire service population of the project, including employees, the project impacts are underreported.

Response: The respondent asserts that the Draft EIR does not analyze and disclose the full impact of the proposed Project's net effect on VMT because Threshold 4.8-3 incorrectly evaluates the VMT from "passengers" only. This statement is incorrect. A second

threshold -- Threshold 4.8-2 -- focuses on employees. As stated in Section 4.8.2.2.3 of the Draft EIR, a Project-specific methodology was developed by LAWA in consultation with LADOT to address the unique VMT characteristics of the proposed Project. Because the majority of the VMT associated with LAX is generated by passengers and employees, separate methodologies were developed for evaluating VMT associated with each of these users. The Daily VMT per Employee metric is consistent with the approach suggested by the Governor's Office of Planning and Research (OPR) and the LADOT TAG for assessing employee VMT. The Daily Passenger VMT metric was developed in the absence of a recommended approach by OPR or LADOT for airport passengers but was discussed and coordinated with LADOT. The assessment of passenger VMT differs from employee VMT in that LAX is considered a regional serving land use and, as such, it includes passenger trips from beyond Los Angeles County. Thus, in accordance with the LADOT TAG guidance for regional serving venues, it is appropriate to analyze employees differently than the patrons because their travel choices and the available travel demand management strategies are dramatically different for these two groups.

ATMP-PC035-55

Comment: 5. The transportation mitigation measures in the DEIR are inadequate and do not include all reasonably feasible requirements for reducing VMT. According to Page 4.8-56 of the DEIR, the project has a significant and unavoidable impact as a result of total passenger VMT in comparison to the baseline conditions. It would require a reduction of 32,786 VMT per day to meet the passenger related VMT criteria. However, no mitigation measures are offered to help relieve this increase in VMT as a result of the project. CEQA requires significant impacts be mitigated to the maximum extent feasible. THE DEIR incorrectly proclaims that there is no feasible mitigation to reduce this impact. However, there are in fact numerous additional mitigation measures that can be included to reduce the VMT impact, including: provide additional off-site van pools and neighborhood shuttles for passengers, expand public transit services, provide public transit subsidies, provide bike-share and car-share programs, and encourage passengers (such as through advertisement) to use other modes of transportation getting to and from the airport. Additionally, there are other improvements that the project could do to improve pedestrian and bicycle infrastructure which has been shown to reduce VMT. Thus, additional mitigation measures should also include improvements to the pedestrian network, on-site traffic calming improvements, protected bike lanes, cycle tracks or separated bike trails, additional secured bike storage and end of trip facilities, and other non-automotive improvements to help reduce the projects affect upon VMT.

Response: As discussed on page 4.8-56 of the Draft EIR, the strategies available for reducing passenger VMT are limited, are not within the control of LAWA, and are more difficult to monitor and report. In addition, there is insufficient data or research available to quantify the VMT reductions that would be achieved through these strategies in a setting like LAX. Please see Topical Response TR-ATMP-T-2 regarding vehicle miles traveled (VMT) mitigation measures and monitoring for the LAX Airfield and Terminal Modernization Project. As indicated therein, MM-T (ATMP)-1 in the Draft EIR describes the list of potential VMT reduction strategies considered available for reducing VMT impacts associated with the proposed Project. The list includes strategies to reduce

passenger VMT. The topical response also addresses all of the additional VMT reduction strategies requested by the commenter.

ATMP-PC035-56

Comment: 6. The DEIR offers very little in terms of transportation impacts during construction, which is expected to occur for at least seven years. Typically, most major projects such as the proposed project would make estimates for each phase of construction of the traffic impacts associated with the hundreds of construction workers and numerous trips made by construction vehicles that need to travel to and from the project site. None of this type of evaluation was included in the DEIR and future plans are left open to figure out how the transportation system will be accommodated during construction. With the combination of continued passenger growth at the airport, the disruption of traffic conditions as a result of the construction work and the addition of hundreds of additional vehicles, including large trucks, there will be substantial impacts to traffic flow and delays to the motoring public both using the airport and traveling on the near-by roadways.

Response: The content of this comment is similar in nature to the content of comment ATMP-AL010-133; please refer to Response to Comment ATMP-AL010-133.

ATMP-PC035-57

Comment: The impacts of parking, the large number of construction workers, and equipment/materials storage have not been addressed in the DEIR. It raises questions, such as: How and where will construction workers park and to what extent will this affect parking for the public at the airport? If shuttle buses will be employed by the project to transport construction workers from off-site parking facilities, then to what extent will this affect airport operations? The potential impacts during construction have not been adequately evaluated and the DEIR continually differs mitigation of these issue into the future.

Response: As described in Section 4.8.1 of the Draft EIR, the transportation impacts analysis was prepared in accordance with the requirements of CEQA, including the 2018 amendments to the State CEQA Guidelines and the City of Los Angeles Department of Transportation's (LADOT's) Transportation Assessment Guidelines (TAG). Neither CEQA nor the LADOT TAG require the assessment of parking impacts. It should be noted, however, that construction-related parking needs and logistics of equipment/materials storage associated with large development projects at LAX have for many years been, and continue to be, successfully accommodated and managed by LAWA. This is accomplished primarily through the LAX Coordination and Logistics Management (CALM) Team, which often manages the construction logistics for several large projects that are under construction at the same time.

ATMP-PC035-58

Comment: 7. The DEIR leaves out several key policy objectives when assessing whether the project would conflict with an applicable program, plan, ordinance, or policy addressing the circulation system (including transit, roadways, bicycle and pedestrian facilities) that was adopted to protect the environment. For example, Table 4.8-11 only analyzes the project's consistency with three (3) policies from of the Los Angeles Mobility Plan 2035. However, there are in fact over fifty (50) different policies in the Mobility Plan 2035, many of which the project would likely conflict with. For example, the DEIR has not demonstrated how the project is consistent with Mobility Plan 2035 policies to enhance roadway safety (Policy 1.1), promote complete streets (Policy 1.2), ensure multi-modal detour facilities are provided during construction (Policy 1.6), expand bicycle network (Policy 2.6), maintain the vehicle network (Policy 2.7), accommodate people with disabilities (Policy 3.2), increase transit service (Policy 3.4), implement first and last mile solutions to transit service (Policy 3.5), support integrated and dynamic transportation database (Policy 4.2), encourage zero emissions vehicle (Policy 5.4). The DEIR should assess consistency with all applicable policy measures.

Response: The commenter states that additional policies from the City's Mobility Plan 2035 should be considered in the EIR. As explained in Section 4.8.5.1 of the Draft EIR, a review was conducted to determine whether the proposed Project would conflict with a transportation-related City or regional plan, program, ordinance, or policy that was adopted to protect the environment. Transportation policies or standards adopted to protect the environment are those that support multimodal transportation options and a reduction in VMT. The three policies analyzed for the City's Mobility Plan 2035 in Table 4.8-11 are the most relevant to the land use and roadway network modifications that would be implemented with the proposed Project. The other policies noted by the commenter, such as promoting complete streets, expanding the bicycle network, increasing transit service, and encouraging zero emissions vehicles, were not included in Table 4.8-11 because they are not directly relevant to the proposed Project. This is because the proposed Project is not anticipated to result in an impact based merely on whether it would or would not implement an adopted plan, program, ordinance, or policy. Rather, the policy analysis in the EIR is intended to ensure the proposed Project does not conflict with nor preclude the City from implementing adopted plans, programs, ordinances, or policies. In this case, the proposed Project is not in conflict with, and would not interfere with the City's attainment of, the policies cited by the commenter. Specifically:

- Policy 1.1 – enhance roadway safety. The road improvements incorporated into the proposed Project would enhance roadway safety. In particular, road access to and from the CTA from Sepulveda Boulevard would be improved by the provision of a dedicated roadway system, much of which would be elevated above local roadways with more favorable connections to Sepulveda Boulevard (i.e., more removed from the traffic congestion and vehicle weaving movements near the Sepulveda Tunnel).

- Policy 1.2 – promote complete streets. Roadways proposed as part of the Project are specifically designed to provide dedicated access to and from terminal facilities. While such access, being mostly on elevated roadways, is not suitable for pedestrians and bicycles, the proposed road improvements would build upon the LAX Landside Access

Modernization Project, which is designed to improve access to LAX by tying into local and regional public transit systems and multi-modal transportation. By integrating roadways into the LAX Landside Access Modernization Project, the proposed Project would advance, and would not hinder, the City's "complete streets" policy.

- Policy 1.6 – ensure multi-modal detour facilities are provided during construction. LAWA has significant experience managing transportation during construction. LAWA would prepare a Logistic Plan, and its existing Coordination and Logistics Management (CALM) Team would manage transportation throughout the construction period. Temporary roadways available during construction would accommodate shuttles, buses and other, similar vehicles. Temporary traffic control would comply with applicable standards (e.g., California Manual on Uniform Traffic Control Devices for Streets and Highways).

- Policy 2.6 – expand bicycle network. The LAX Landside Access Modernization Project includes expansion of, and improvements to, the bicycle network that connects with the existing bike path along Aviation Boulevard, which connects to the bike paths on Imperial Highway that extend into neighboring communities. The LAX Landside Access Modernization Project also includes the Automated People Mover providing access to the CTA from the ITF West and ITF East, which provide connections to regional transit and regional bike networks. The proposed LAX Airfield and Terminal Modernization Project is designed to accommodate and "fit" with those improvements.

- Policy 2.7 – provide vehicular access to the regional freeway system. The proposed Project does not include changes to, nor is it in close proximity to, the regional freeway system.

- Policy 3.2 – accommodate people with disabilities. All facilities constructed as part of the proposed Project would comply with applicable requirements with respect to access for those with disabilities.

- Policy 3.4 – increase transit service. The proposed Project accommodates public transit. Although LAWA does not have authority over public transit systems, Mitigation Measure MM-T (ATMP)-1, VMT Reduction Program, includes several strategies to promote the use of public transit. In addition, the LAX Landside Access Modernization Project includes extensive improvements to provide seamless connections between LAX and regional and local transit systems, and the proposed LAX Airfield and Terminal Modernization Project is designed to integrate with those improvements.

- Policy 3.5 – implement first and last mile solutions to transit service. The proposed Project is designed to integrate with the LAX Landside Access Modernization Project, which provides connections to local and regional transit systems.

- Policy 4.2 – support integrated and dynamic transportation database. LAWA works closely with Los Angeles Department of Transportation (LADOT) in developing airport-related transportation database information and in coordinating roadway operations communication systems (i.e., Automated Traffic Surveillance and Control [ATSAC] systems) in the airport area.

• Policy 5.4 – encourage zero emissions vehicles. As set forth in MM-AQ/GHG (ATMP)-4, the Terminal 9 parking facility would include electric vehicle (EV) charging infrastructure beyond the amount required by code. Please refer to Topical Response TR-ATMP-AQ/GHG-1. The proposed Project is consistent with this policy.

Under CEQA, a project is considered consistent with an applicable plan if it is consistent with the overall intent of the plan and would not preclude the attainment of its primary goals. A project does not need to be in perfect conformity with each and every policy. The proposed Project would not prevent the City of Los Angeles from meeting the additional policies noted by the commenter.

ATMP-PC035-59

Comment: Conclusions

RK Engineering Group, Inc. has reviewed the LAX Airfield and Terminal Modernization Project DEIR with respect to transportation impacts. Several shortcomings within the analysis have been identified, and as a result, not all potentially significant impacts have been identified.

In particular, the DEIR fails to analyze the full extent of the project impact, which will occur after year 2028, when the modernization project would allow for significantly more growth in passenger travel. The DEIR also does not disclose the potential roadway safety and operational impacts from construction, passenger vehicle and employee traffic.

Furthermore, the DEIR does not apply all reasonably feasible mitigation measures to mitigate significant VMT impacts to the maximum extent feasible.

Response: The comment is a general summary of the assertions made in the eight paragraphs that precede the statement. Please see Responses to Comments ATMP-PC035-51 through ATMP-PC035-58 above.

ATMP-PC035-60

Comment: RK ENGINEERING GROUP, INC. (RK) is pleased to provide this review of potential environmental noise impacts from the LAX Airfield and Terminal Modernization Project. This review is based on the information provided in the Los Angeles International Airport Airfield and Terminal Modernization Project Draft Environmental Impact Report, October 2020 (hereinafter referred to as DEIR).

Los Angeles World Airport (LAWA) proposes to implement airfield, terminal and landside roadway improvements at LAX. The proposed project consists of several primary elements, (including airfield improvements) that would enhance operational management and safety within the airfield, new terminal facilities to upgrade passenger processing capabilities and enhance the passenger experience, and an improved system

of the roadways to better access the Central Terminal Area (CTA) and new facilities while reducing congestion. It is anticipated that the project construction would occur from Year 2021 to Year 2028 (when full completion of the project is expected).

The project is an extensive multi-phase construction project which will occur over several years (2021 to 2028) and has the potential of impacting surrounding residential neighborhoods, schools and businesses from increased construction and operational noise.

Response: The comment is an introduction to the March 15, 2021 noise review performed by RK Engineering Group, Inc. (Exhibit B of the comments submitted by Jordan Sisson, on behalf of Gideon Kracov, Attorney at Law) and includes a general summary of project description information contained in Chapter 2, Description of the Proposed Project, of the Draft EIR. Regarding the commenter's specific comments pertaining to Project-related construction and operational noise, please see Responses to Comments ATMP-PC035-61 through ATMP-PC035-71 below.

ATMP-PC035-61

Comment: The purpose of this letter is to review the DEIR from a noise impact standpoint and provide comments to help ensure that all potential impacts from the project are adequately identified and the effects mitigated to the maximum extent feasible.

Response: Please see Responses to Comments ATMP-PC035-62 through ATMP-PC035-71 below.

ATMP-PC035-62

Comment: Comments

The following comments are offered with respect to the noise impacts of the LAX Airfield and Terminal Modernization Project DEIR:

1. Section 4.7.1.1.3, Effects of Noise on Humans. The DEIR delivers contradictory statements and appears to dismiss the widely recognized fact that environmental noise affects human health. Specifically, the statement on page 4.7.1-13 that says, "the effects of noise on health are too speculative for further evaluation in this CEQA document" is misleading. The California Noise Control Act explicitly declares that excessive noise is a serious hazard to the public health and exposure to certain levels of noise can result in physiological and psychological damage.[1] CEQA standards dictate that an EIR convey a meaningful idea of the health consequences from the project's environmental impacts to allow for informed agency decision making and informed public participation. Therefore, the final EIR should take additional steps to correlate the potential health effects of noise exposure to the identified project impacts.

[1] California Health and Safety Code, Division 28. Noise Control Act, 4600, et.al.

Response: Please see Topical Response TR-ATMP-N-1 regarding health effects of noise.

ATMP-PC035-63

Comment: 2. Section 4.7.1.2.3, Classroom Disruption. The DIER references noise level data from "LAX school sound insulation efforts" that shows the average noise reduction at schools near LAX is 29 dBA with windows closed. However, it does not provide the data to substantiate this statement. The widely accepted industry standard for exterior-to-interior noise reduction from building shell insulation is 20 dBA, as identified in Table 4.7.1-2. Therefore, additional evidence should be provided to support the use of 29 dBA exterior-to-interior noise reduction for schools. As will be seen, this assumption is a key factor in the assessment of impacts to classroom disruption. Furthermore, by using the average observed interior noise reduction, it is likely that potential building shell noise reduction at schools with inferior insulation would be overestimated. It is therefore recommended that the classroom disruption analysis be based on building performance for each specific classroom/building within the study area or utilize the industry standard 20 dBA noise reduction. As it is now, the DEIR appears to be using overly generous assumptions and is not analyzing the full extent of potential impacts.

Response: Section 4.7.1.2.3 of the Draft EIR discusses the screening criteria of 84 and 94 dBA exterior noise exposure for schools to be below 55 dBA and 65 dBA in the classroom for small group and large group settings, respectively.

As part of their school sound insulation efforts, LAWA has conducted exterior and interior noise measurements at several schools throughout the area.[1] According to information provided by LAWA's Noise Management office, the average difference between outside and inside measured noise levels with windows closed at these schools was 29 dBA. Therefore, in order to attain interior noise levels inside the classroom of 55 dBA and 65 dBA for small and large group settings, exterior noise levels would need to be less than 84 and 94 dBA, respectively.

It should be noted that any change in the assumption of exterior-to-interior noise reduction would apply both to the existing baseline and to the proposed Project. As indicated in Section 4.7.1.4 of the Draft EIR, the threshold of significance related to aircraft-related noise impacts on schools is: "Cause a substantial increase in the amount of time that aircraft-induced noise would affect classroom learning, as compared to baseline conditions." The impacts analysis presented in Section 4.7.1.5.3 of the Draft EIR accounts for future increases and changes in aircraft operations associated with the proposed Project in 2028, as compared to 2018 baseline conditions. Any change in the assumption of exterior-to-interior noise reduction would not affect the differences between the existing baseline and the proposed Project relative to aircraft volumes, types, and operational characteristics, as currently assumed in the Draft EIR. As such, the basic nature and magnitude of the differences in noise characteristics between the existing baseline and the proposed Project that are presented in Section 4.7.1.4 as the basis for determining significant impacts would not materially change with a revised assumption for exterior-to-interior noise reduction.

[1] City of Los Angeles, Los Angeles World Airports, Final Environmental Impact Report for Los Angeles International Airport (LAX) Specific Plan Amendment Study, (SCH 1997061047), Section 4.10, Noise, January 2013. Available: https://www.lawa.org/lawa-

our-lax/environmental-documents/documents-certified/specific-plan-amendment-study/documents.

ATMP-PC035-64

Comment: 3. Section 4.7.1.3.2, Environmental Setting. In relationship to the issue of classroom disruption discussed in Comment #2, the DEIR does not substantiate the screening criteria of 84 and 94 dBA exterior exposure for schools to be below 55 dBA and 65 dBA in the classroom, respectively. Figure 4.7.1-6 and Table 4.7.1-6 identify 28 schools that are located within the existing LAX 65 dBA CNEL contour. Yet no evidence has been provided that shows that all of the school buildings in all of the 28 schools would provide at least 29 dBA of building insulation, as has been assumed in the study. Absent substantial evidence, the DEIR should assume a maximum exterior-to-interior building noise reduction of 20 dBA with windows closed. As a result, additional noise impacts may likely occur beyond what has been reported.

Response: The content of this comment is similar to comment ATMP-PC035-63; please refer to Response to Comment ATMP-PC035-63.

ATMP-PC035-65

Comment: 4. Section 4.7.1.3.2, Environmental Setting. The final EIR should provide a table indicating the exterior Lmax noise level exposure at all schools identified in Figure 4.7.1-6 and Table 4.7.1-6. Since this information is used as the basis for establishing the existing environmental setting and for analyzing the project's impact to school exposure, it is important that the data be provided for all sensitive noise receptors (schools) within the study area (65 dBA CNEL contour).

Response: Section 4.7.1.5.3.2 identifies changes in school exposure to aircraft noise with the implementation of the proposed Project in 2028. The threshold of significance for classroom learning conditions is such that a significant impact would occur if the proposed Project would "[c]ause a substantial increase in the amount of time that aircraft-induced noise would affect classroom learning, as compared to baseline conditions" (see Section 4.7.1.4 of the Draft EIR).

The commenter's assertion that the Lmax exterior noise level was used for analyzing the impacts of the proposed Project with respect to classroom learning is incorrect. The maximum exterior noise level reached at each school was not modeled for this Draft EIR because the determining factor for assessing whether there is an impact to classroom learning is based on whether there is a substantial increase in the amount of time that aircraft-induced noise would affect classroom learning, as defined by interior single event maximum noise levels, not the exterior Lmax reached at each school.

The interior noise levels that would indicate a disruption to classroom learning are greater than 55 dBA Lmax for large group settings and greater than 65 dBA Lmax for small group settings. These interior levels are calculated based on an assumption of an

outside-to-inside noise reduction with windows closed of 29 dBA, which is based on pre- and post-measurement data collected for the LAWA school sound insulation efforts. As such, exterior noise levels would need to exceed 84 dBA Lmax and 94 dBA Lmax for the 55 dBA Lmax and 65 dBA Lmax thresholds, respectively. Table 4.7.1-13 indicates the number of schools that would experience interior noise exposure levels greater than 55 dBA Lmax and greater than 65 dBA Lmax with implementation of the proposed Project as compared to baseline conditions. No schools would be newly exposed to interior noise levels above 55 or 65 dBA Lmax.

In addition, Table 4-7-1.14 provides the total number of minutes (events multiplied by average durations) per school day that exceed an exterior noise level of 84 decibels Lmax, which equates to an interior noise level of 55 dBA Lmax at each of the schools listed. Implementation of the proposed Project would not increase the total number of minutes per school day that exceed an exterior noise level of 84 decibels Lmax at any school.

ATMP-PC035-66

Comment: 5. Section 4.7.1.5, Project Impacts. The DEIR fails to consider the full extent of project noise impacts by not analyzing long-term conditions (i.e. year 2045). The buildout noise analysis year in the DEIR is year 2028, yet as shown in Appendix B, Table 3-7, LAX is expected to generate an additional 165,316 annual aircraft operations in Year 2045, as compared to Year 2028. This would result in substantially higher noise levels and additional impacts beyond what has been analyzed in the EIR. To put it into perspective, the Hollywood Burbank Airport, which is one of the top 10 busiest airports in the State of California[2], generated approximately 146,095 total annual aircraft operations last year[3]. Thus, a significant amount of planned growth, which can be directly and/or cumulatively attributed to the project, was not accounted for in the DEIR.

[2] Federal Aviation Administration. Website: https://www.faa.gov/airports/planning_capacity/passenger_allcargo_stats/passenger/media/cy18-commercial-service-enplanements.pdf
[3] Hollywood Burbank Airport. Website: https://hollywoodburbankairport.com/about-us/history_facts/

Response: Please see Topical Response TR-ATMP-G-3 regarding the reasons why 2028 is the appropriate horizon year for evaluating the impacts of the proposed Project. In addition, Topical Response TR-ATMP-G-3 includes a general analysis of impacts beyond 2028; this analysis includes a discussion of noise impacts. For the reasons explained therein, the Draft EIR's analysis of noise impacts is accurate and appropriate.

ATMP-PC035-67

Comment: 6. Section 4.7.1.5, Project Impacts. As discussed in Section 2.3.1.2.2, and supported by the data in Appendix B, "airfield congestion is not projected to be a constraint on growth until after year 2028". Hence, one of the primary purposes of the airfield, terminal and landside improvements is to reduce potential constraints on growth after year 2028. Yet the DEIR conceals the long term impacts of the project by only analyzing near-term

conditions in year 2028. Based on the data shown in Appendix B, Activity Forecasts Reports, the impacts of the "with project" versus "without project" scenarios would likely be much more substantial in year 2045 than in year 2028. The final EIR should address all reasonably foreseeable long term impacts (i.e. year 2045) from the project, as reported elsewhere in the DEIR.

Response: Please see Topical Response TR-ATMP-G-3 regarding the bases for why 2028 is the appropriate horizon year for evaluating the impacts of the proposed Project. With respect to the commenter's assertions that the proposed Project is designed to reduce potential constraints on growth after year 2028, please also see Responses to Comments ATMP-AL010-31 through ATMP-AL010-46 regarding allegations that implementation of the proposed Project would relieve capacity constraints and would induce additional growth at LAX beyond 2028. Please also see Section 2.3.1.2.2 of the Draft EIR. As explained there, the annual activity forecast and regression analysis prepared by LAWA's aviation experts determined that aircraft operations would be the same in 2028 with or without the proposed Project, and that the proposed Project would not result in increased aviation and/or passenger activity levels or capacity at LAX. This analysis is supported by substantial evidence as documented in Appendix B.1 of the Draft EIR. Please see Topical Response TR-ATMP-G-1 for further discussion of the validity of this forecast.

ATMP-PC035-68

Comment: 7. Section 4.7.1.5, Project Impacts. Figures 4.7.1-7 through 4.7.1-10 show the 2028 Forecast "Proposed Project" CNEL Contours (65-75 dB). However, upon review of the CNEL contour map, there is no change in noise levels in the vicinity of the proposed Terminal 9 and Concourse 0. This seems unlikely, especially near Concourse 0, which would be replacing an existing parking lot with an active terminal for Southwest Airlines. Given the close proximity to the existing Hyatt Regency Hotel and neighboring office buildings along Sepulveda Boulevard, further detail of the potential noise impacts from planes taxing in and out of the area should be provided.

Response: Figure 4.7.1-7 of the Draft EIR illustrates the aircraft noise contours (65, 70, and 75 CNEL) projected to occur in 2028 (the buildout year of the proposed Project) and identifies the land uses that would be newly exposed as compared to 2018 baseline conditions. Figure 4.7.1-8 of the Draft EIR identifies the area that is projected to experience a 1.5 dBA increase in noise exposure levels within the 65 CNEL contour for the Proposed Project (2028) compared to 2018 baseline conditions. Figures 4.7.1-9 and 4.7.1-10 of the Draft EIR are included for informational purposes. Figure 4.7.1-9 shows Future Without Project (2028) 65-75 CNEL contours compared to 2028 proposed Project and 2018 baseline conditions. Figure 4.7.1-10 shows the areas projected to experience a 1.5 dBA increase in noise exposure levels within the 65 CNEL contour for the Future Without Project (2028) scenario compared to proposed Project (2028) and 2018 baseline conditions. The area of interest to the commenter, including the existing Hyatt Regency Hotel located at the northeast corner of Sepulveda Boulevard and Century Boulevard, is currently exposed to exterior noise levels due to aircraft of between 70 CNEL and 75 CNEL, as shown in Figure 4.7.1-6 of the Draft EIR. As can be surmised from that figure,

those existing aircraft noise levels are largely influenced by aircraft departures occurring on Runways 24L and 25R.

As described in Section 4.7.1.5.1 of the Draft EIR, implementation of the proposed Project would generate operational aircraft noise that would increase noise levels at exterior use areas of noise-sensitive uses to 65 CNEL or above during operations, as compared to existing baseline conditions; this would be a significant operational impact. Table 4.7.1-11 provides the increase in acreage between the 2028 proposed Project and baseline (2018) conditions, showing an increase of 205 acres in the 65-70 CNEL contour, and 58 acres each to the 70-75 and 75+ CNEL contours. These increases in contour size and associated increases in noise-sensitive uses being exposed to exterior noise levels of 65 CNEL or more would occur several miles east of the airport. The increases in aircraft noise levels anticipated to occur in 2028 compared to 2018 would occur because of the future increase in aircraft activity. This projected increase in aircraft activity is expected to occur, and aircraft noise levels are projected to be the same, with or without the proposed Project.

As noted in Section 4.7.1.5 of the Draft EIR, "[a]lthough the proposed Project would reconfigure some of the taxiways and runway exits in the North Airfield, these improvements would not alter runway configurations or orientations, and would not result in changes to departure or approach noise." Similarly, the development of Concourse 0 and Terminal 9 would not increase the number of aircraft operations projected to occur at LAX regardless of the proposed Project. As such, the future aircraft noise exposure levels within the area of concern, including at the existing Hyatt Regency Hotel, would continue to be dominated by aircraft arrivals and departures on the north and south runway systems. As a large international airport, minor changes in taxiway noise, such as taxiing to and from aircraft gates, would not result in a notable change to the shape of the noise contours presented in the Draft EIR. Additionally, it should be noted that based on the proposed layouts of Concourse 0 and Terminal 9, as shown in Figures 2-8 and 2-9, respectively of the Draft EIR, there would be a large multi-story structure (i.e., the concourse itself and the terminal itself) located between the aircraft gates areas and where the existing Hyatt Regency Hotel is located. The presence of large structures located between a noise source and a noise receptor is a recognized form of sound attenuation. In that regard, it should also be noted that the Hyatt Regency Hotel is currently located north of the existing LAX Commuter Terminal; for this reason, the hotel is currently not shielded from aircraft noise associated with existing taxiing operations in and around that area (i.e., no large structures in the intervening path of sound travel).

ATMP-PC035-69

Comment: 8. Section 4.7.2, Roadway Noise. The computed noise levels shown in Table 4.7.2-3, 4.7.2-4, and 4.7.2-5 cannot be verified as there is limited supporting data provided in Appendix F. For example, the actual ADT along roadway segments does not appear to be provided.

Response: Section 1 in Appendix F.2 of the Draft EIR describes the modeling methodology and approach used for the assessment of roadway traffic noise impacts associated with the proposed Project. Roadway traffic volume data used to calculate roadway traffic noise were obtained from Fehr & Peers, which were developed through the Project Travel Demand Model that is described in Section 4.8.2 of the Draft EIR, with additional information related to the Model assumptions and calculations provided in Appendix G of the Draft EIR. The Project Travel Demand Model includes an extensive network of local and regional roadways. The following figures depict the local roadways that pertain to the roadway traffic noise analysis completed for the Draft EIR. Figures 1 and 2 indicate the Average Daily Traffic (ADT) volumes for existing (2019) conditions and for future With Project (2028 buildout) conditions, respectively, and Figures 3 and 4 present such information for peak hour traffic, as derived from the Project Travel Demand Model.

ATMP-PC035-70

Comment: 9. Section 4.7.3, Construction Traffic and Equipment Noise and Vibration. The DEIR incorrectly utilizes 24-hour CNEL noise levels to evaluate whether construction activities would exceed the ambient noise level by 5 dBA at a noise sensitive use between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday or before 8:00 a.m. or after 6:00 p.m. on Saturday, or at any time on Sunday. The impact analysis should be based upon actual field measured Leq noise levels during nighttime hours only to determine significance during the nighttime hours. The existing CNEL noise levels shown in Table 4.7.3-1 do not represent the actual nighttime noise levels near the noise sensitive receptors. Nighttime noise levels are significantly quieter than what has been reported using the CNEL metric. Thus, the findings shown in Table 4.7.3-5 are not accurate and additional noise impacts would be expected.

Response: Regarding the use of CNEL, this comment is similar in content to comment ATMP-AL010-88; please refer to Response to Comment ATMP-AL010-88. Regarding noise measurements, this comment is similar in content to comment ATMP-AL010-87; please refer to response to comment ATMP-AL010-87.

ATMP-PC035-71

Comment: 10. Section 4.7.3.5.2.2, Mitigation Measures. The DEIR does not include all reasonably feasible mitigation measures for reducing potential noise impacts. The Construction Noise Control Plan should include a requirement for active construction noise monitoring at adjacent noise sensitive receptors anytime construction activities take place during nighttime hours. Active nighttime noise monitoring would help ensure actual construction noise levels (not based on computer models) do not exceed the nighttime noise standards in the City of Los Angeles or exceed existing ambient

nighttime noise levels by more 5 dBA. The monitoring program should monitor and establish the adequate baseline noise levels for each receptor prior to commencing any activity. The monitoring program should also notify construction management personnel when noise levels approach and/or exceed the applicable thresholds. Construction activity should cease or be modified in order to ensure violations do not occur. Repeated violations should result in fines or other penalties.

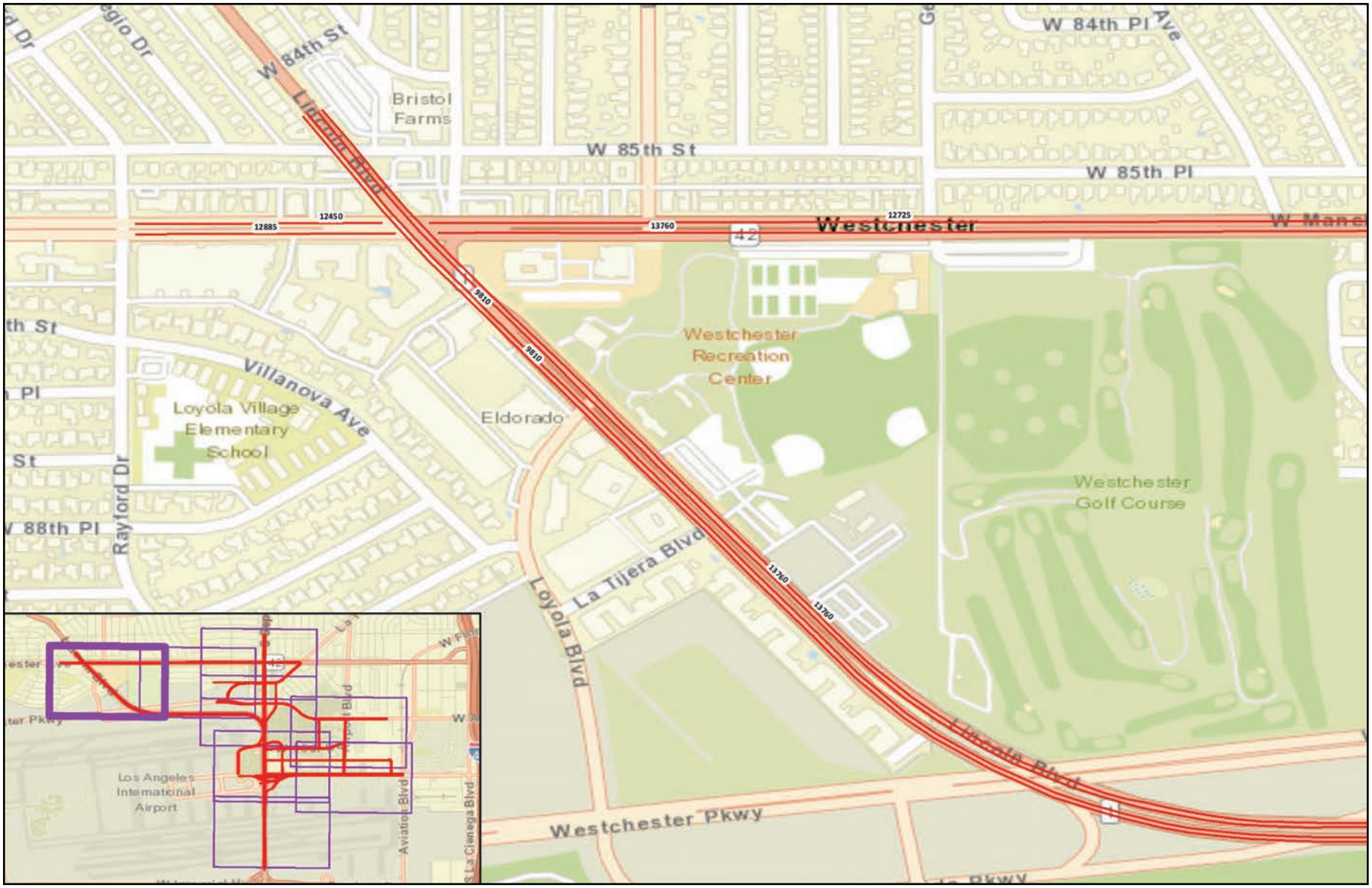
Response: The content of this comment is the same as comment ATMP-PC035-38; please refer to Response to Comment ATMP-PC035-38.

ATMP-PC035-72

Comment: We have reviewed the October 2020 Draft Environmental Impact Report ("DEIR") for the Airfield & Terminal Modernization Project ("Project") located in the City of Los Angeles ("City"). The Project proposes the development of Taxiway D Extension West, Runway 6L-24R Exits, Concourse 0, Terminal 9, as well as the removal and replacement of 15 of the 18 West Remote Gates and roadway system improvements, on the 3,800-acre airport property.

Our review concludes that the DEIR fails to adequately evaluate the Project's air quality, health risk, and greenhouse gas impacts. As a result, emissions and health risk impacts associated with construction and operation of the proposed Project are underestimated and inadequately addressed. An updated EIR should be prepared to adequately assess and mitigate the potential air quality, health risk, and greenhouse gas impacts that the project may have on the surrounding environment.

Response: This comment summarizes the conclusions of the report that was submitted as part of comment letter ATMP-PC035. Responses to the specific comments provided in the report are provided in Responses to Comments ATMP-PC035-73 through ATMP-PC035-99 below.



Not to Scale

Sources: HMMH, ESRI, Fehr & Peers, OpenStreetMap, May 2021

Prepared by: CDM Smith, July 2021

Legend

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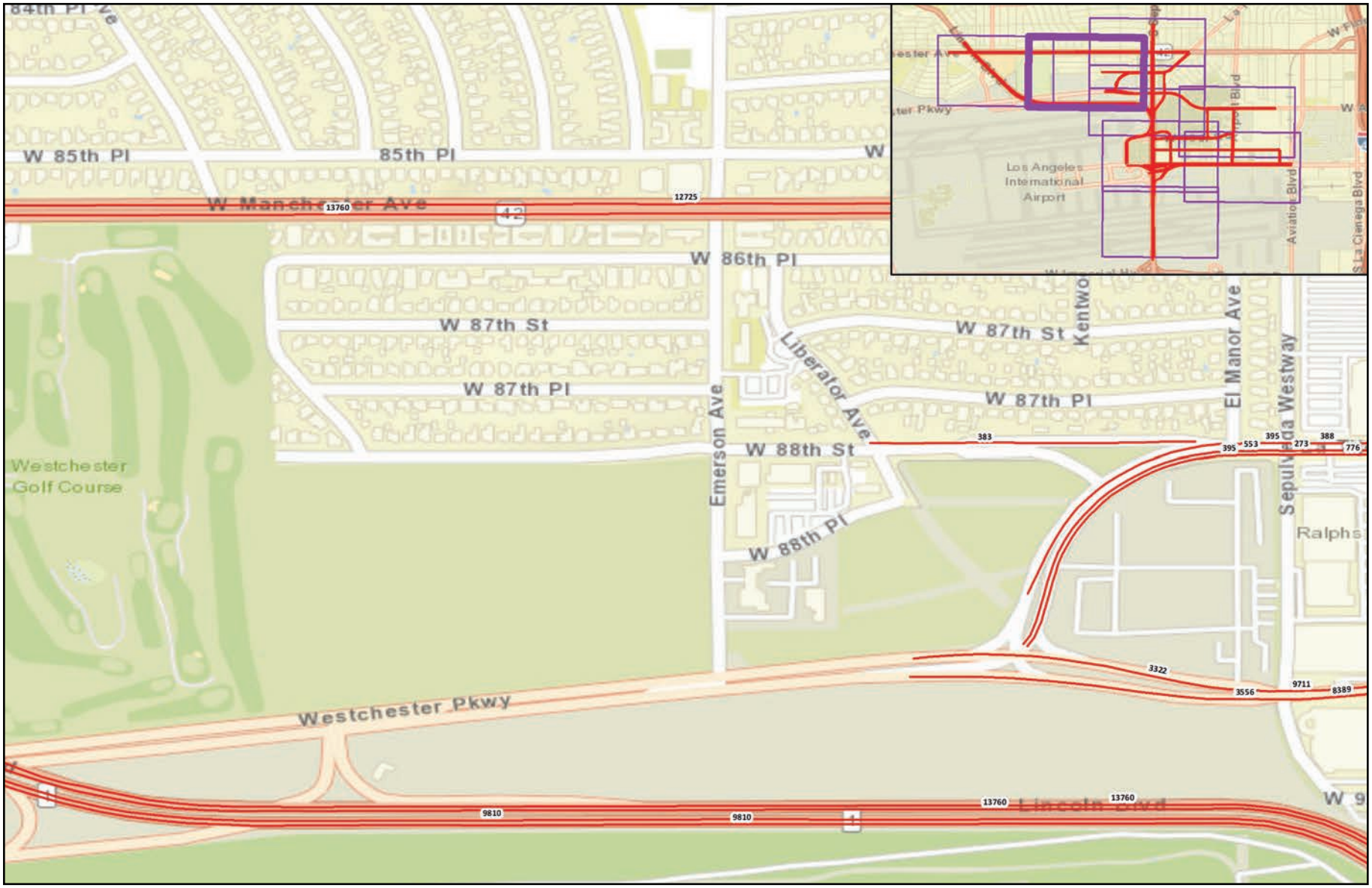
Traffic volumes are indicated on or slightly above roadway for each direction of travel

LAX Airfield and Terminal Modernization Project	Average Daily Traffic (ADT) - Panel 1 of 8 2019 Existing Conditions	Figure **1a**



Not to Scale

Sources: HMMH, ESRI, Fehr & Peers, OpenStreetMap, May 2021

Prepared by: CDM Smith, July 2021

Legend

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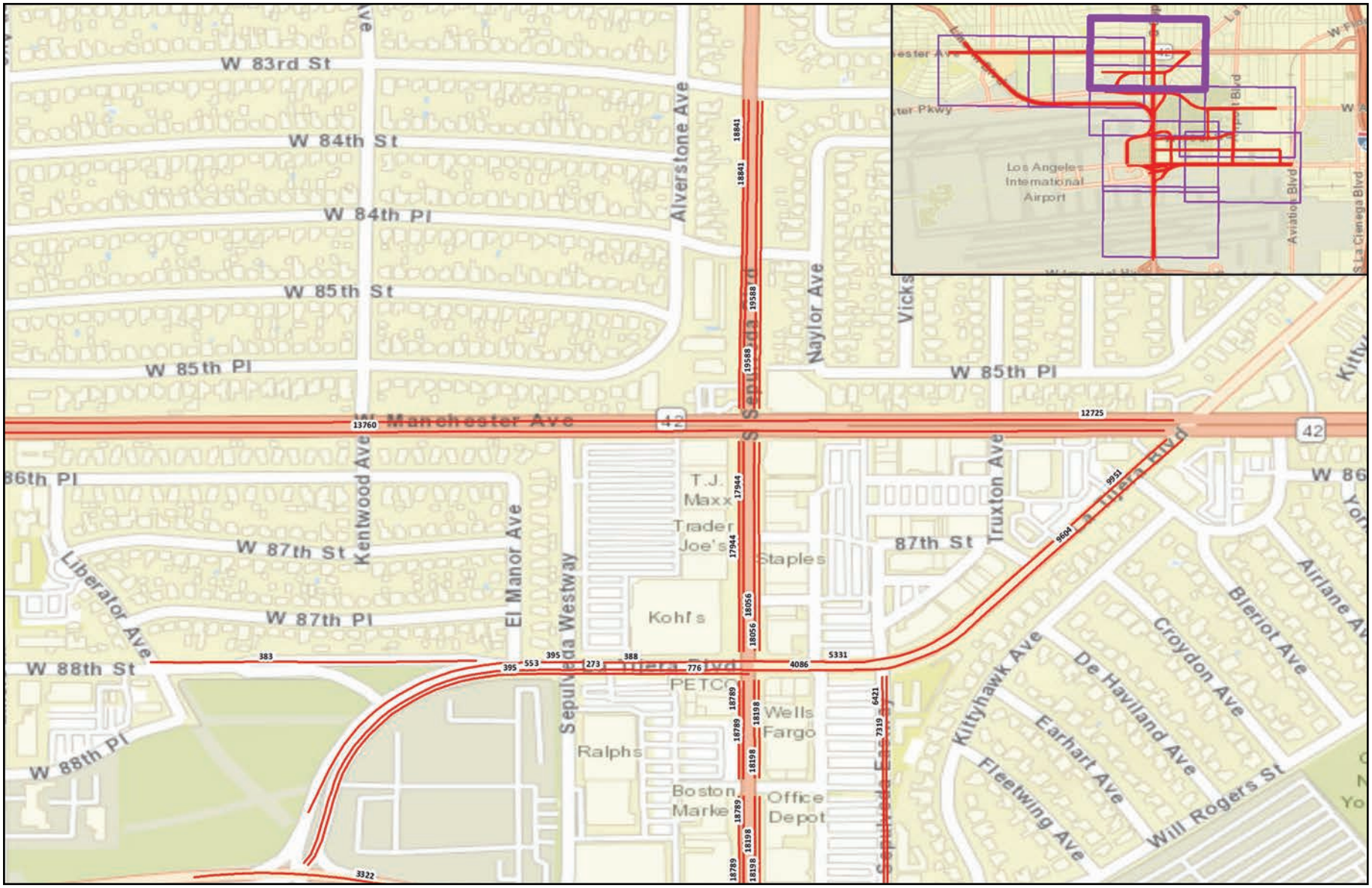
Traffic volumes are indicated on or slightly above roadway for each direction of travel

LAX Airfield and Terminal Modernization Project	Average Daily Traffic (ADT) - Panel 2 of 8 2019 Existing Conditions	Figure **1b**



Not to Scale

Sources: HMMH, ESRI, Fehr & Peers, OpenStreetMap, May 2021

Prepared by: CDM Smith, July 2021

Legend

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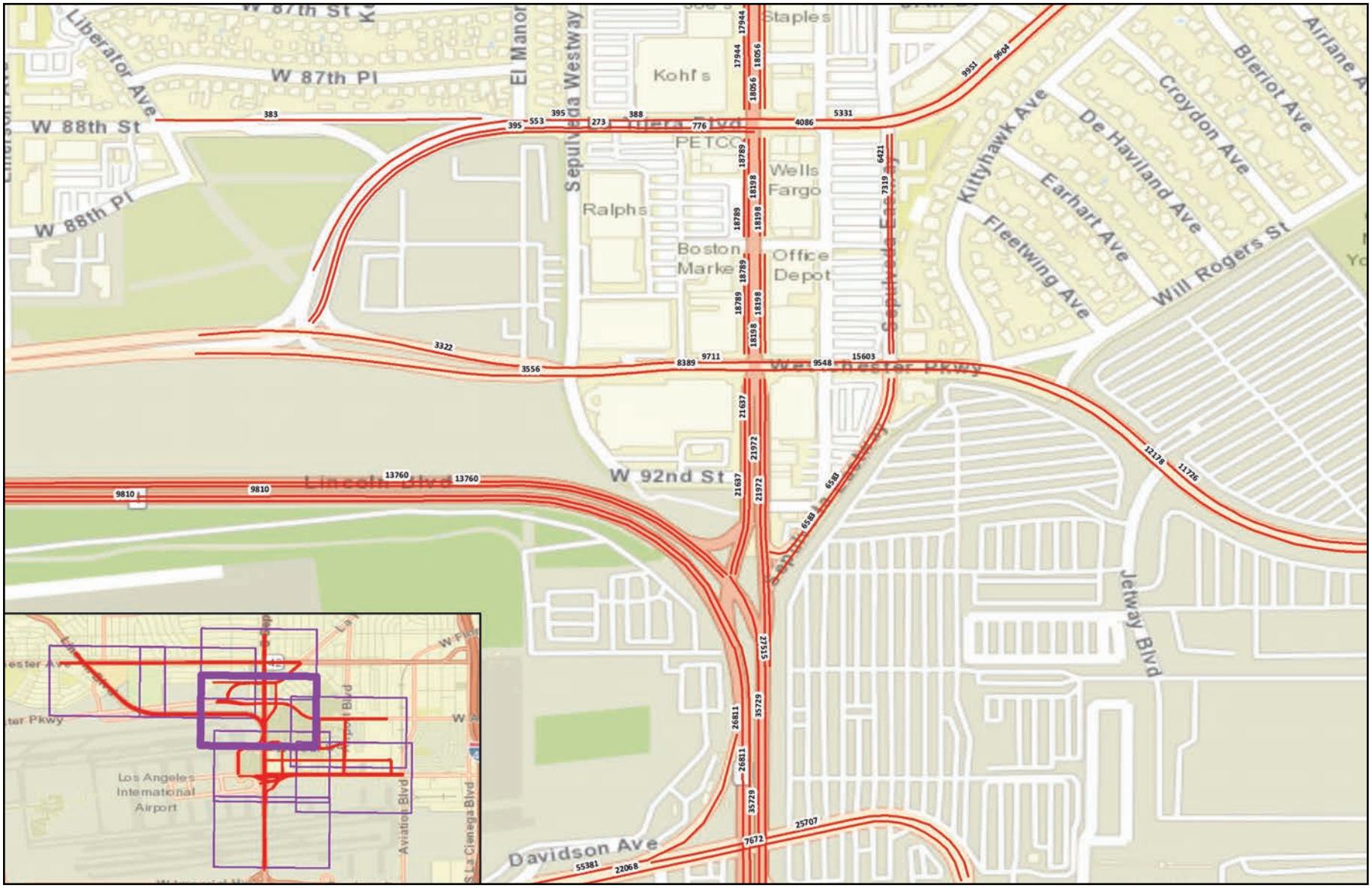
Traffic volumes are indicated on or slightly above roadway for each direction of travel

LAX Airfield and Terminal Modernization Project	Average Daily Traffic (ADT) - Panel 3 of 8 2019 Existing Conditions	Figure **1c**



Not to Scale

Sources: HMMH, ESRI, Fehr & Peers, OpenStreetMap, May 2021

Prepared by: CDM Smith, July 2021

Legend

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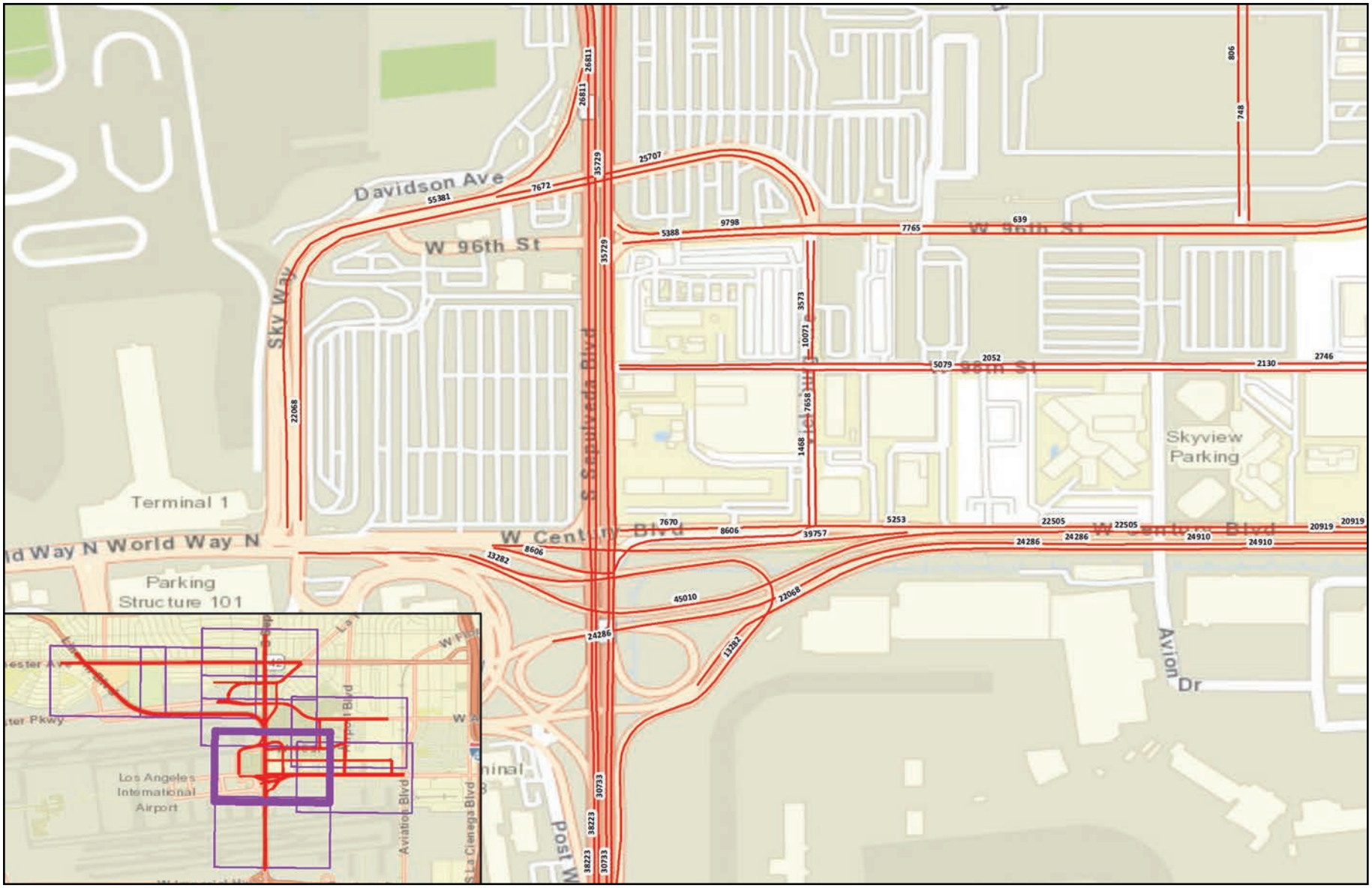
Traffic volumes are indicated on or slightly above roadway for each direction of travel

LAX Airfield and Terminal Modernization Project	Average Daily Traffic (ADT) - Panel 4 of 8 2019 Existing Conditions	Figure **1d**



Not to Scale

Sources: HMMH, ESRI, Fehr & Peers, OpenStreetMap, May 2021

Prepared by: CDM Smith, July 2021

Legend

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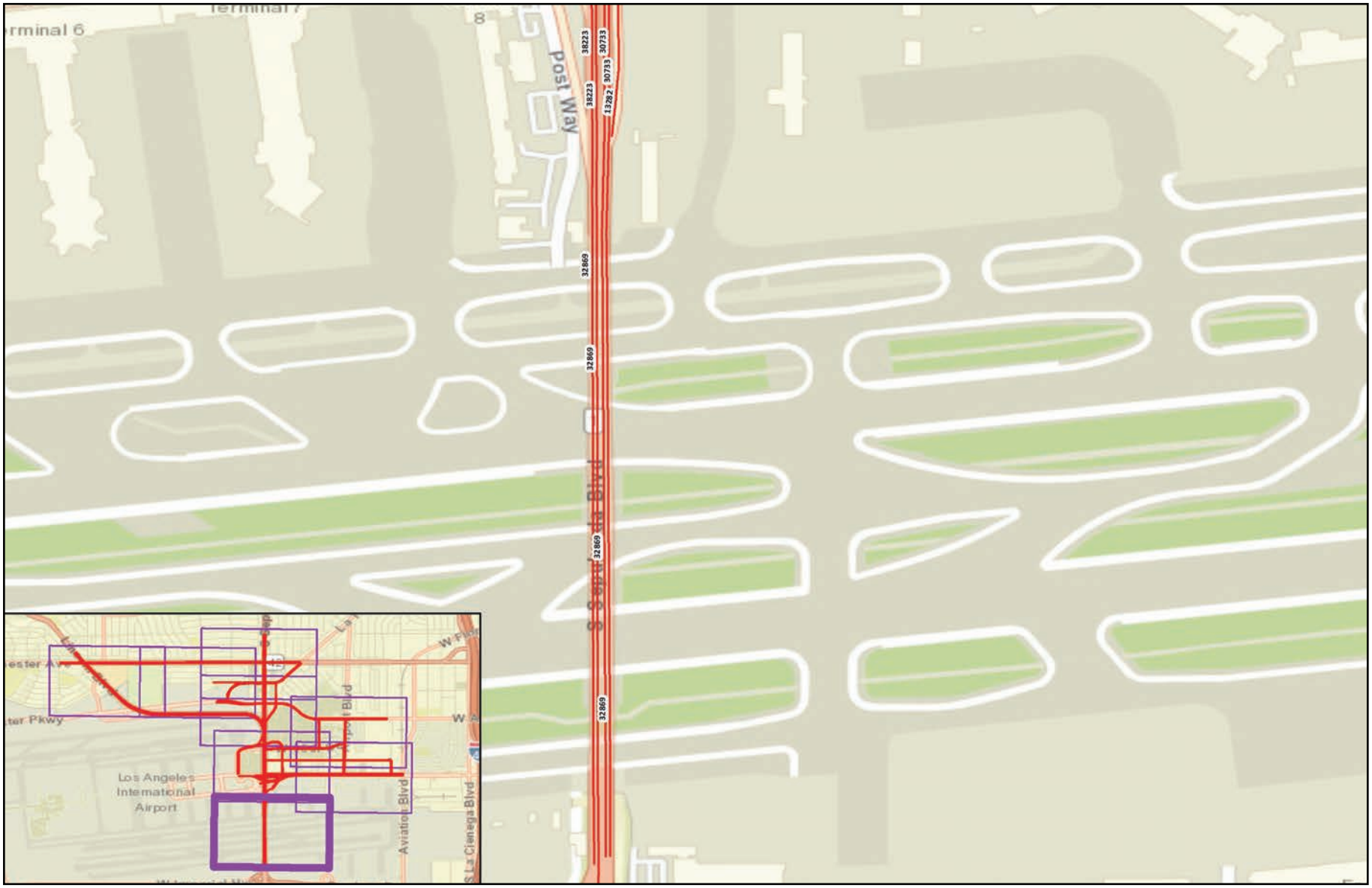
Traffic volumes are indicated on or slightly above roadway for each direction of travel

LAX Airfield and Terminal Modernization Project	Average Daily Traffic (ADT) - Panel 5 of 8 2019 Existing Conditions	Figure **1e**



Not to Scale

Sources: HMMH, ESRI, Fehr & Peers, OpenStreetMap, May 2021

Prepared by: CDM Smith, July 2021

Legend

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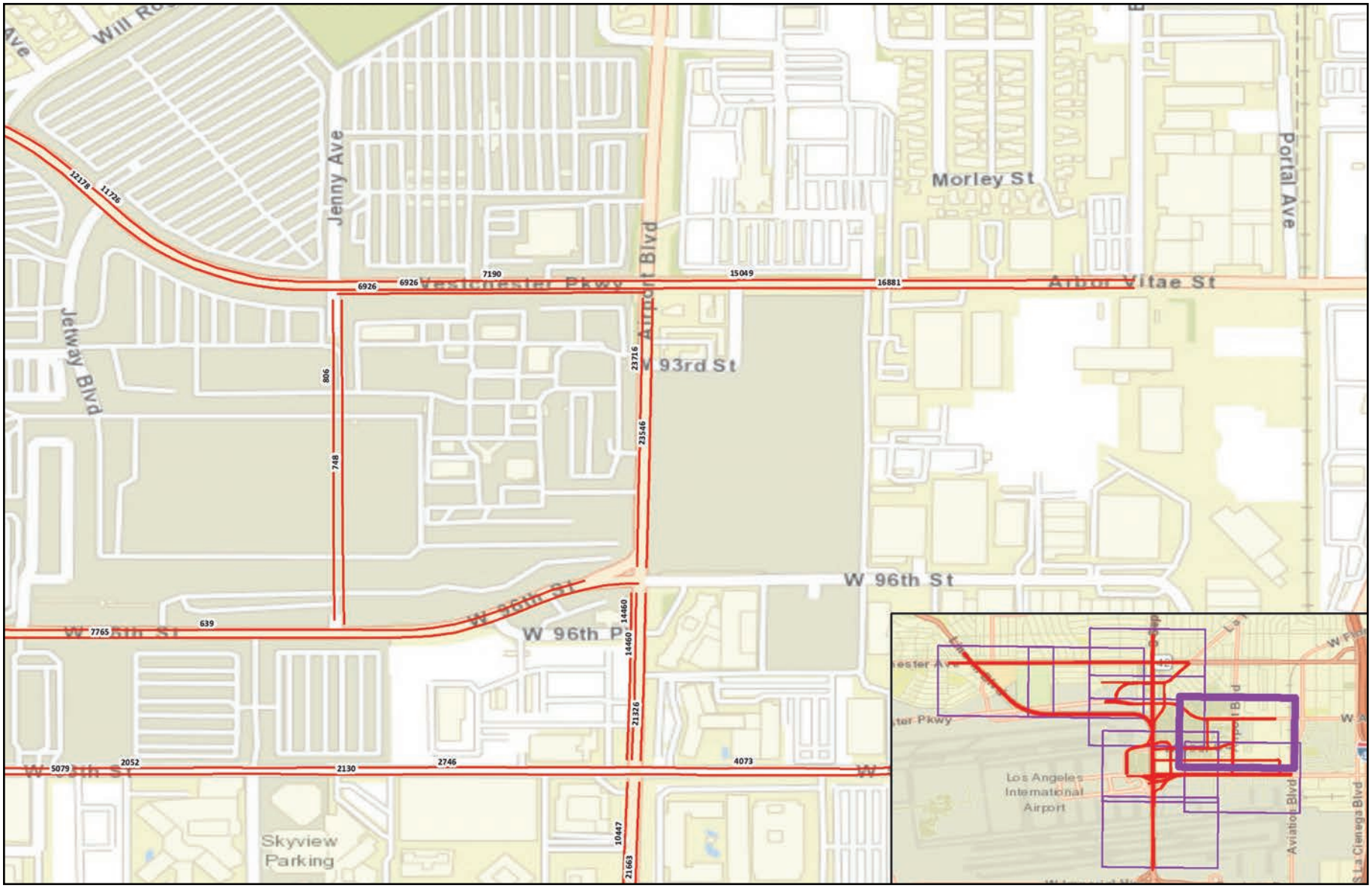
Traffic volumes are indicated on or slightly above roadway for each direction of travel

LAX Airfield and Terminal Modernization Project	Average Daily Traffic (ADT) - Panel 6 of 8 2019 Existing Conditions	Figure **1f**



Not to Scale

Sources: HMMH, ESRI, Fehr & Peers, OpenStreetMap, May 2021

Prepared by: CDM Smith, July 2021

Legend

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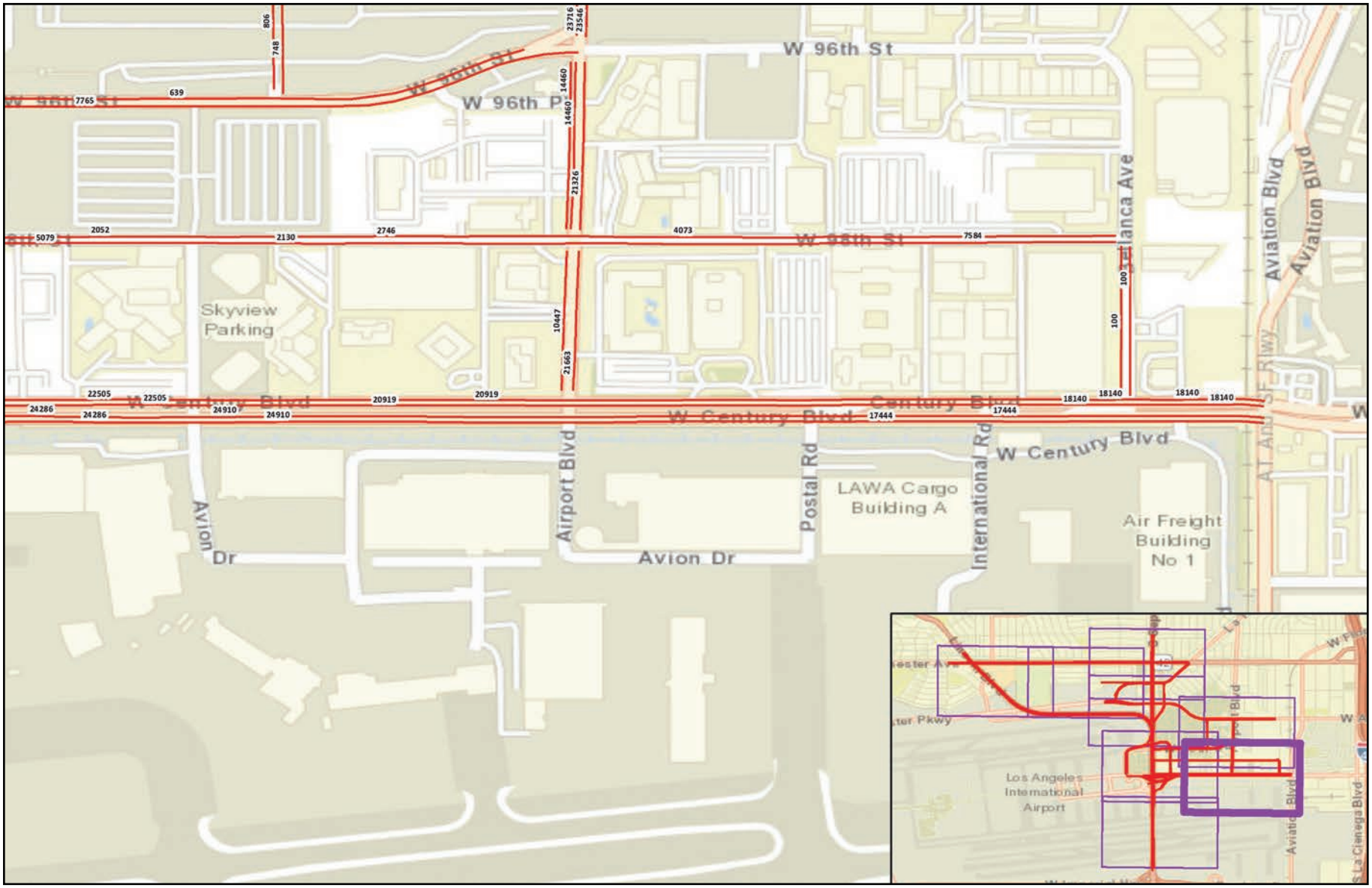
Traffic volumes are indicated on or slightly above roadway for each direction of travel

LAX Airfield and Terminal Modernization Project	Average Daily Traffic (ADT) - Panel 7 of 8 2019 Existing Conditions	Figure **1g**



Not to Scale

Sources: HMMH, ESRI, Fehr & Peers, OpenStreetMap, May 2021

Prepared by: CDM Smith, July 2021

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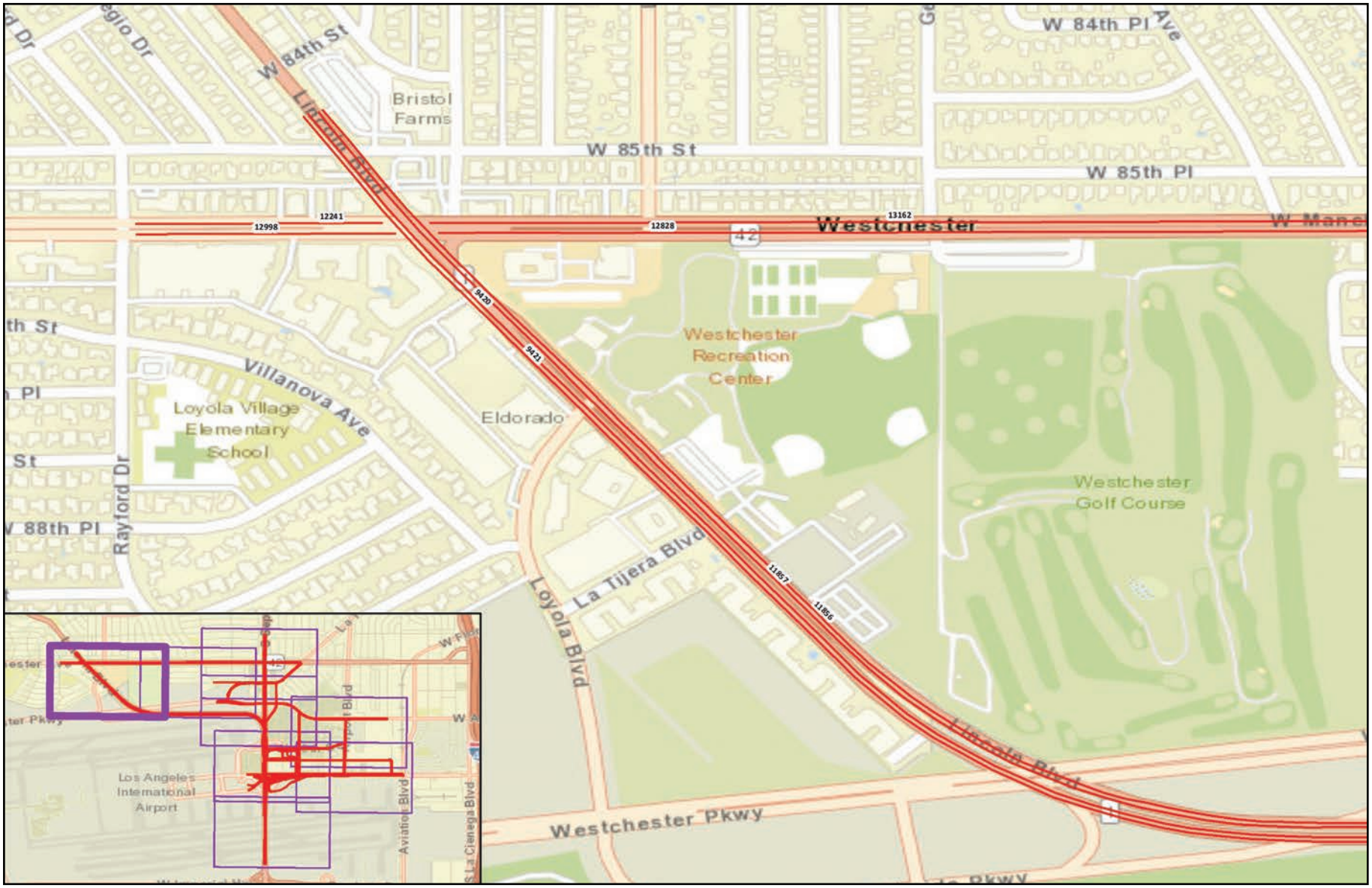
Traffic volumes are indicated on or slightly above roadway for each direction of travel

LAX Airfield and Terminal Modernization Project	Average Daily Traffic (ADT) - Panel 8 of 8 2019 Existing Conditions	Figure **1h**



Not to Scale

Sources: HMMH, ESRI, Fehr & Peers, OpenStreetMap, May 2021

Prepared by: CDM Smith, June 2021

Legend

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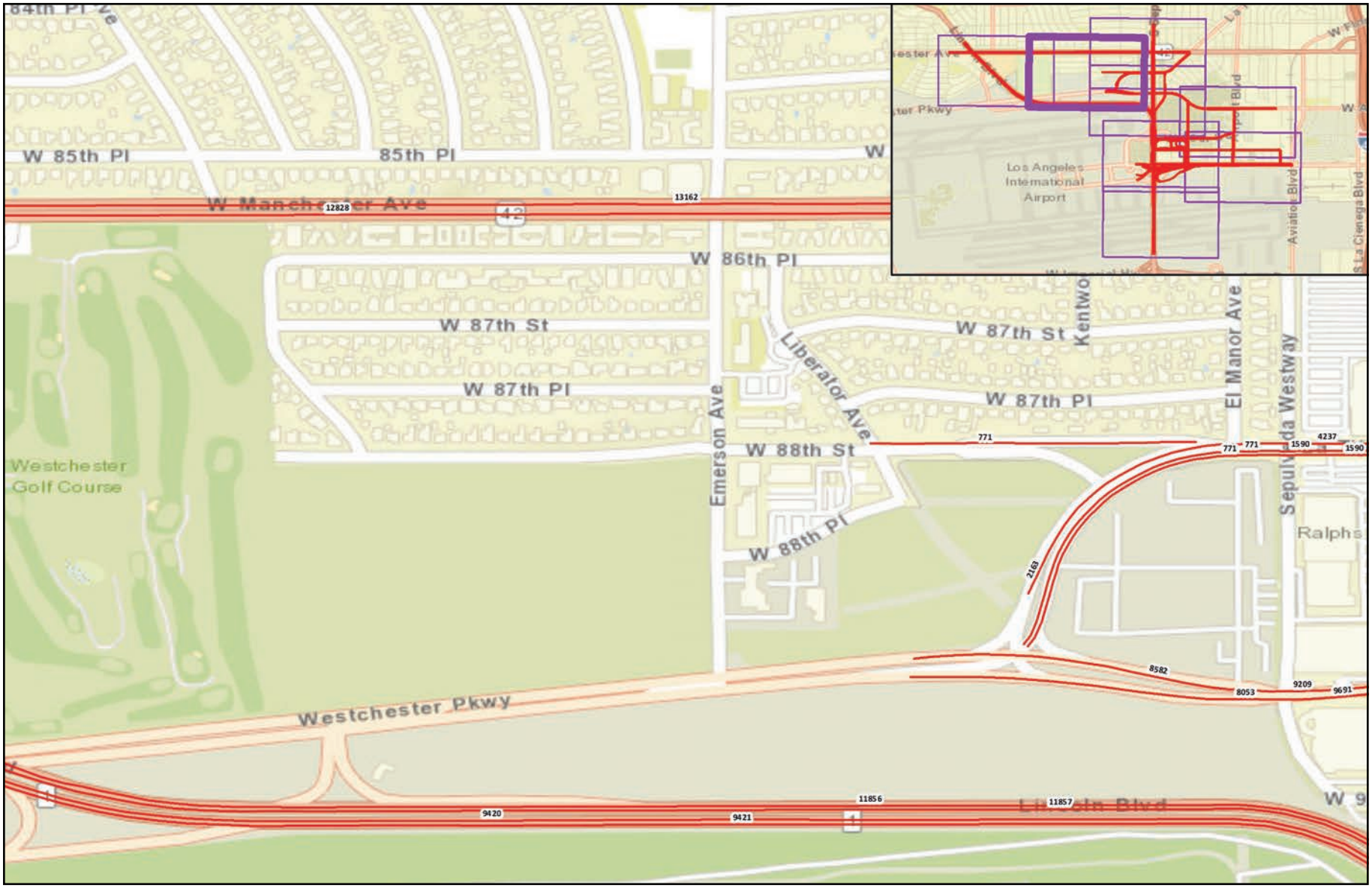
Traffic volumes are indicated on or slightly above roadway for each direction of travel

LAX Airfield and Terminal Modernization Project	Average Daily Traffic (ADT) - Panel 1 of 8 2028 with Project	Figure **2a**



Not to Scale

Sources: HMMH, ESRI, Fehr & Peers, OpenStreetMap, May 2021

Prepared by: CDM Smith, June 2021

Legend

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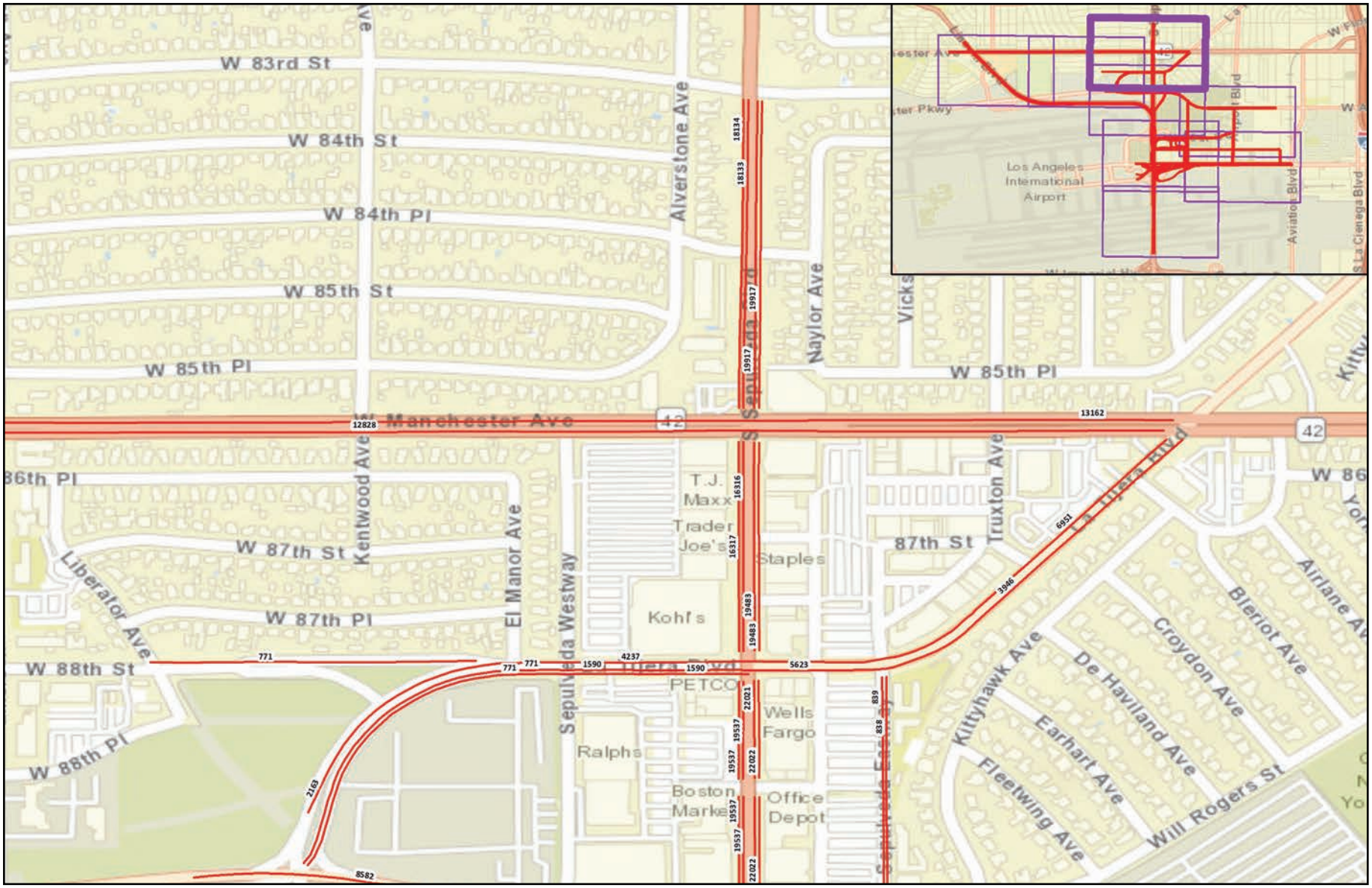
Traffic volumes are indicated on or slightly above roadway for each direction of travel

LAX Airfield and Terminal Modernization Project	Average Daily Traffic (ADT) - Panel 2 of 8 2028 with Project	Figure **2b**



Not to Scale

Sources: HMMH, ESRI, Fehr & Peers, OpenStreetMap, May 2021

Prepared by: CDM Smith, June 2021

Legend

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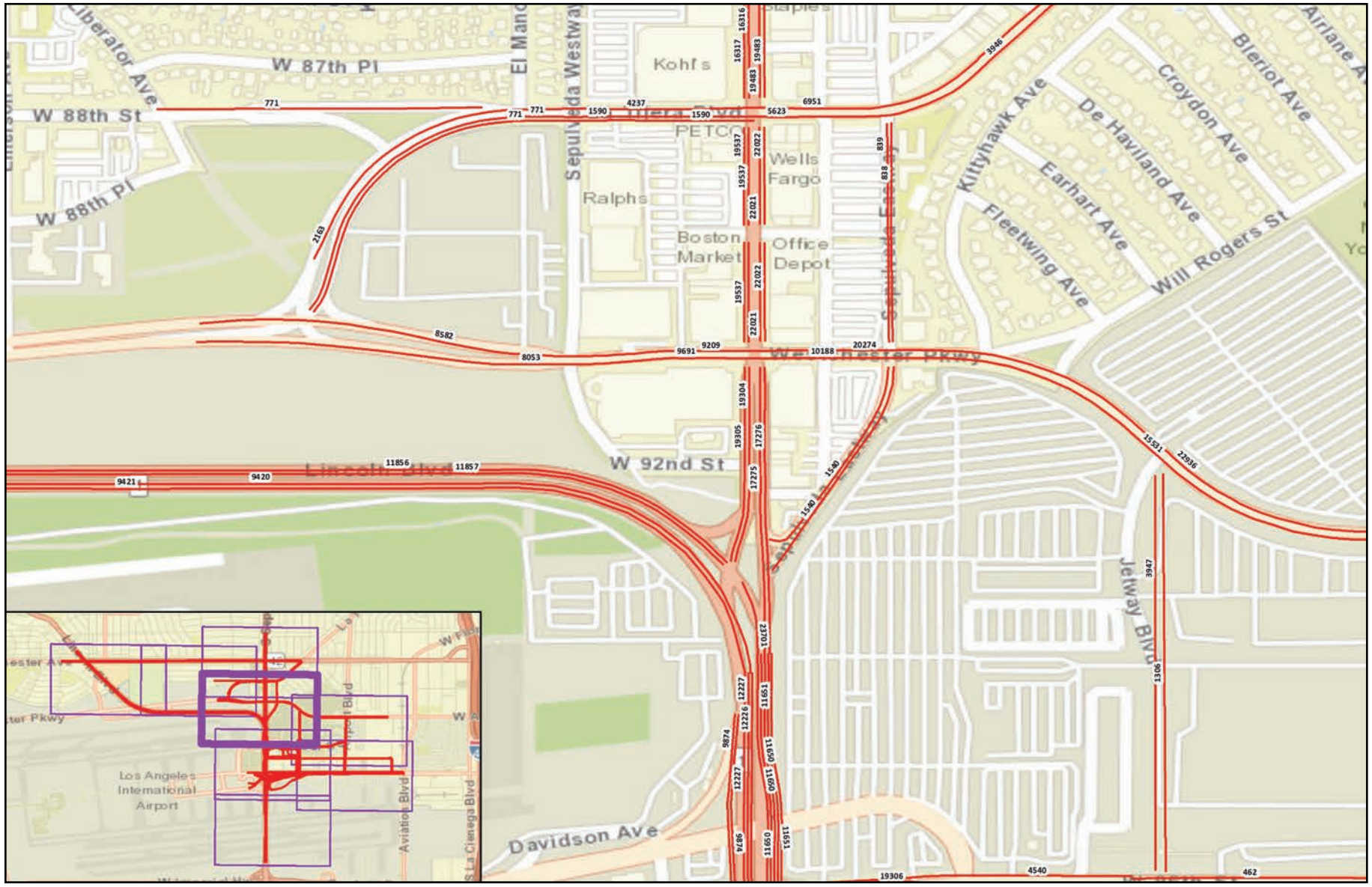
Traffic volumes are indicated on or slightly above roadway for each direction of travel

LAX Airfield and Terminal Modernization Project	Average Daily Traffic (ADT) - Panel 3 of 8 2028 with Project	Figure **2c**



Not to Scale

Sources: HMMH, ESRI, Fehr & Peers, OpenStreetMap, May 2021

Prepared by: CDM Smith, June 2021

Legend

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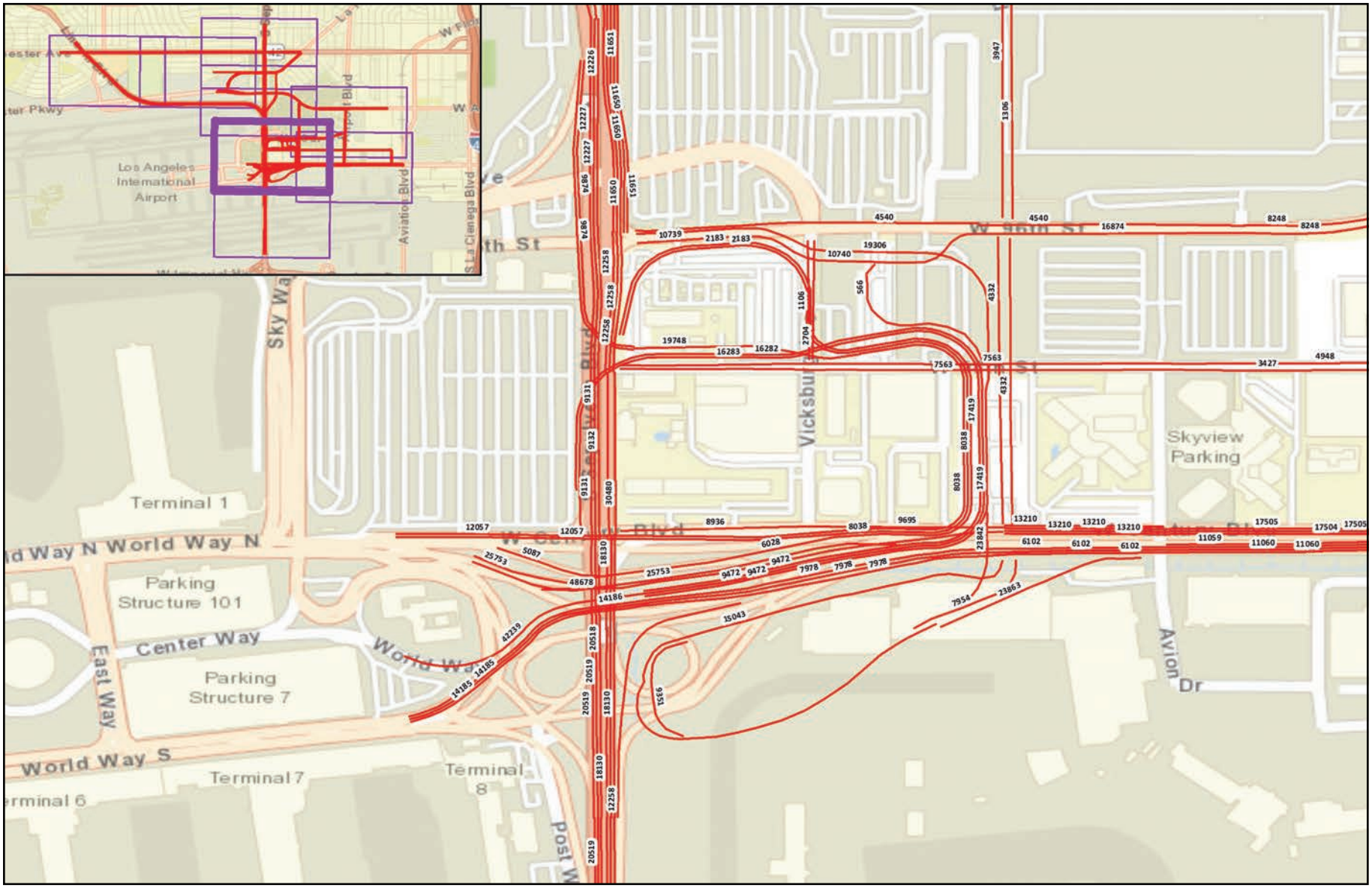
Traffic volumes are indicated on or slightly above roadway for each direction of travel

LAX Airfield and Terminal Modernization Project	Average Daily Traffic (ADT) - Panel 4 of 8 2028 with Project	Figure **2d**



Not to Scale

Sources: HMMH, ESRI, Fehr & Peers, OpenStreetMap, May 2021

Prepared by: CDM Smith, June 2021

Legend

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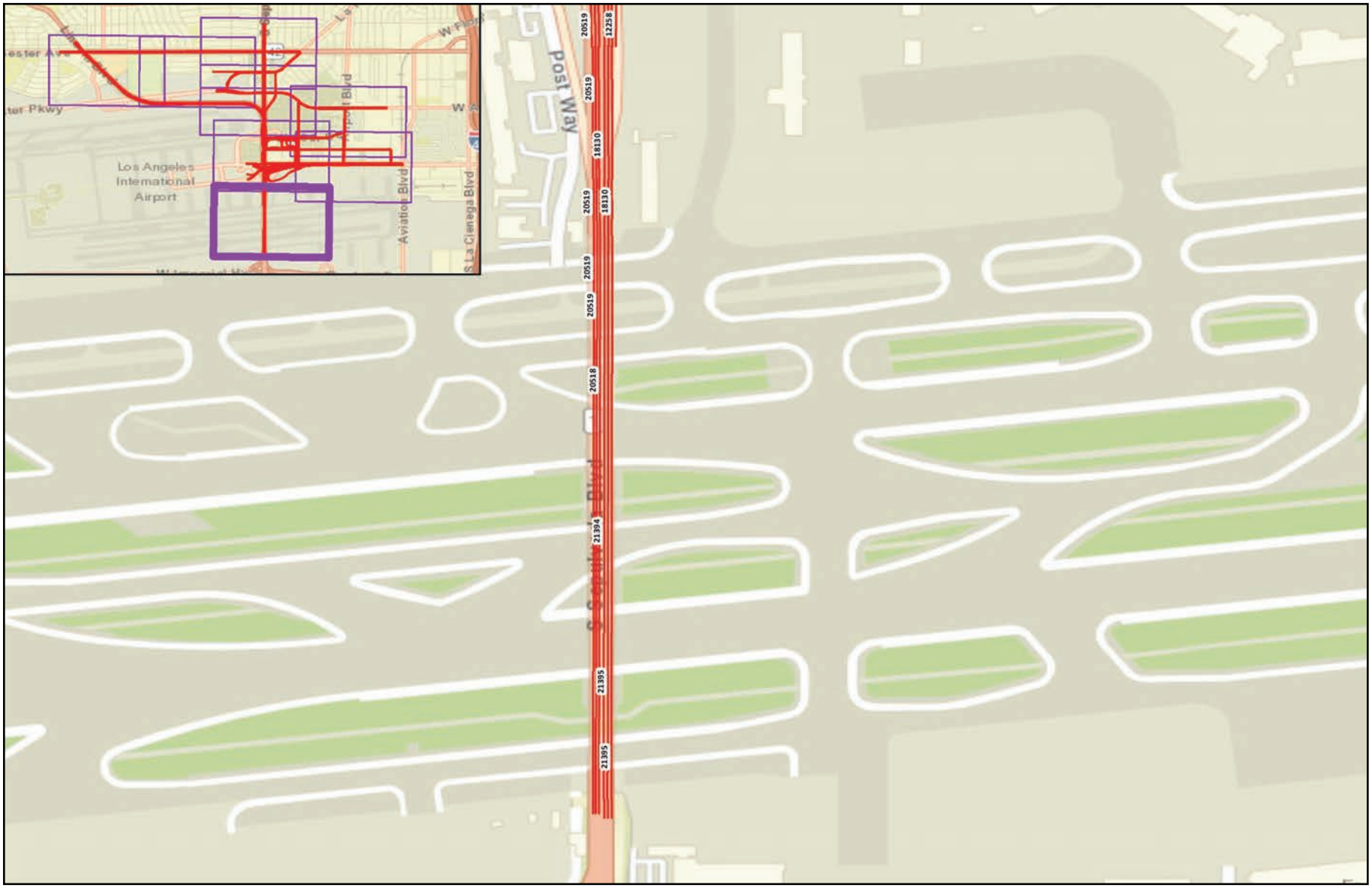
Traffic volumes are indicated on or slightly above roadway for each direction of travel

LAX Airfield and Terminal Modernization Project	Average Daily Traffic (ADT) - Panel 5 of 8 2028 with Project	Figure **2e**



Not to Scale

Sources: HMMH, ESRI, Fehr & Peers, OpenStreetMap, May 2021

Prepared by: CDM Smith, June 2021

Legend

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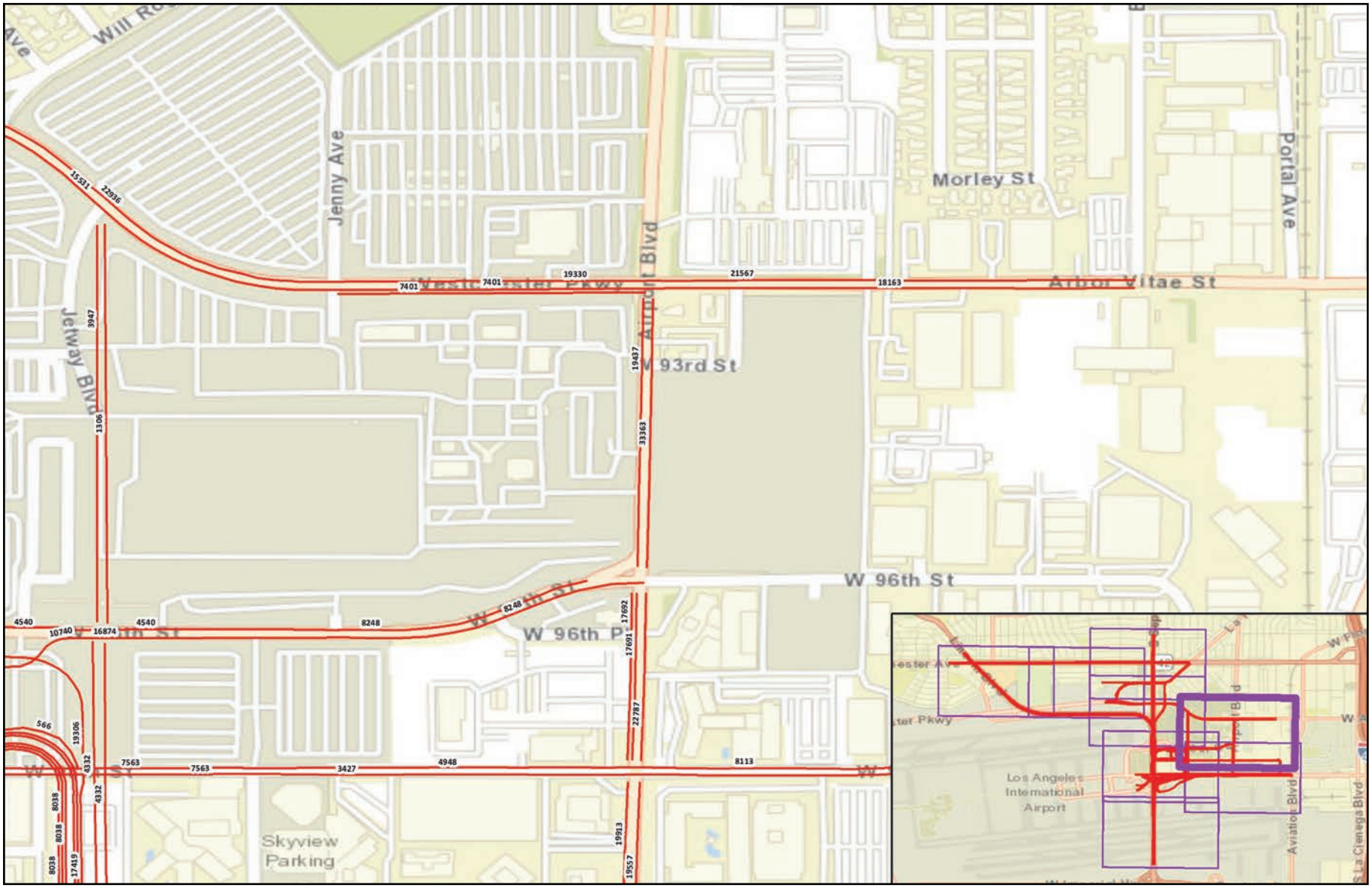
Traffic volumes are indicated on or slightly above roadway for each direction of travel

LAX Airfield and Terminal Modernization Project	Average Daily Traffic (ADT) - Panel 6 of 8 2028 with Project	Figure **2f**



Not to Scale

Sources: HMMH, ESRI, Fehr & Peers, OpenStreetMap, May 2021

Prepared by: CDM Smith, June 2021

Legend

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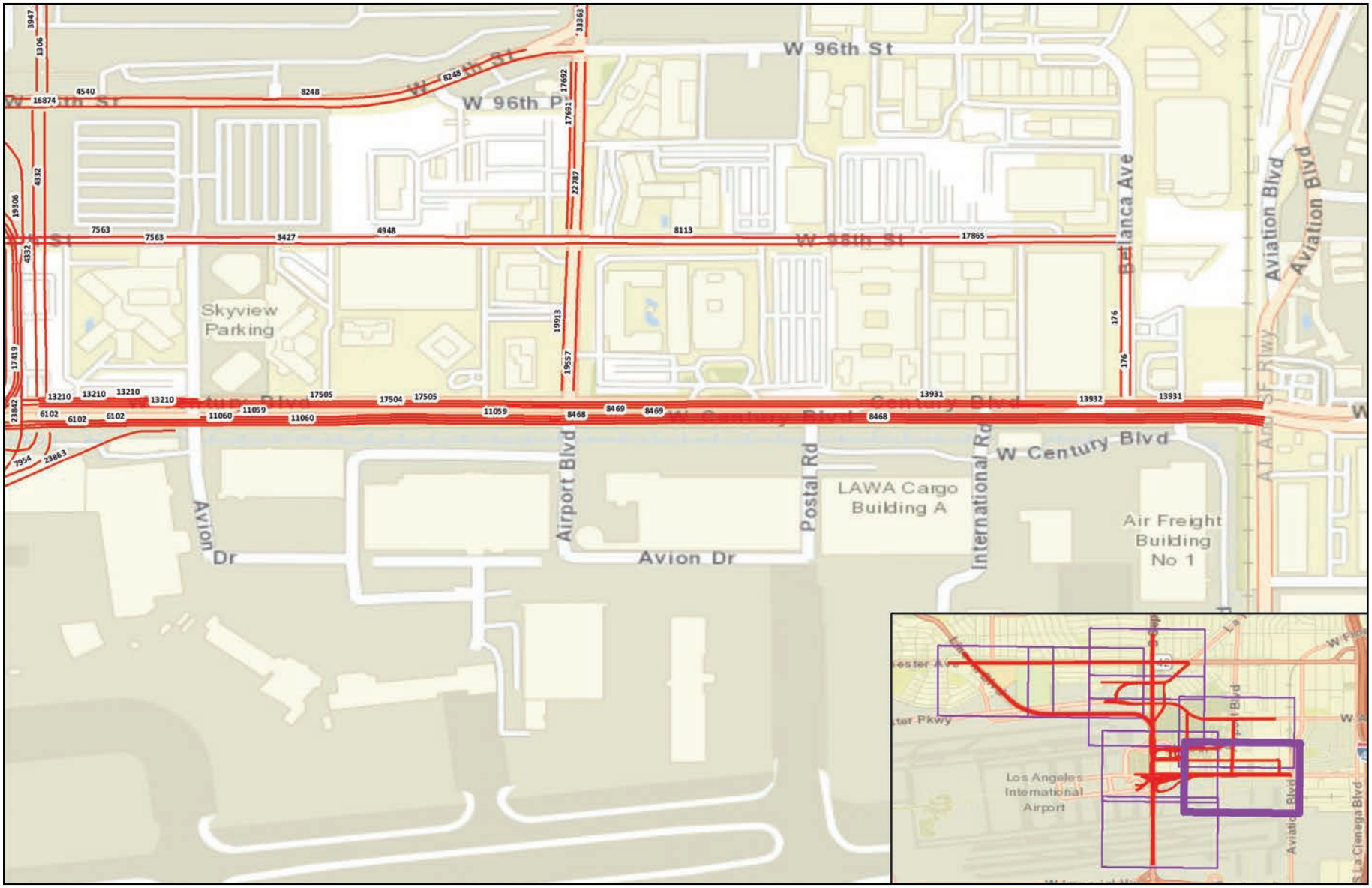
Traffic volumes are indicated on or slightly above roadway for each direction of travel

LAX Airfield and Terminal Modernization Project	Average Daily Traffic (ADT) - Panel 7 of 8 2028 with Project	Figure **2g**



Not to Scale

Sources: HMMH, ESRI, Fehr & Peers, OpenStreetMap, May 2021

Prepared by: CDM Smith, June 2021

Legend

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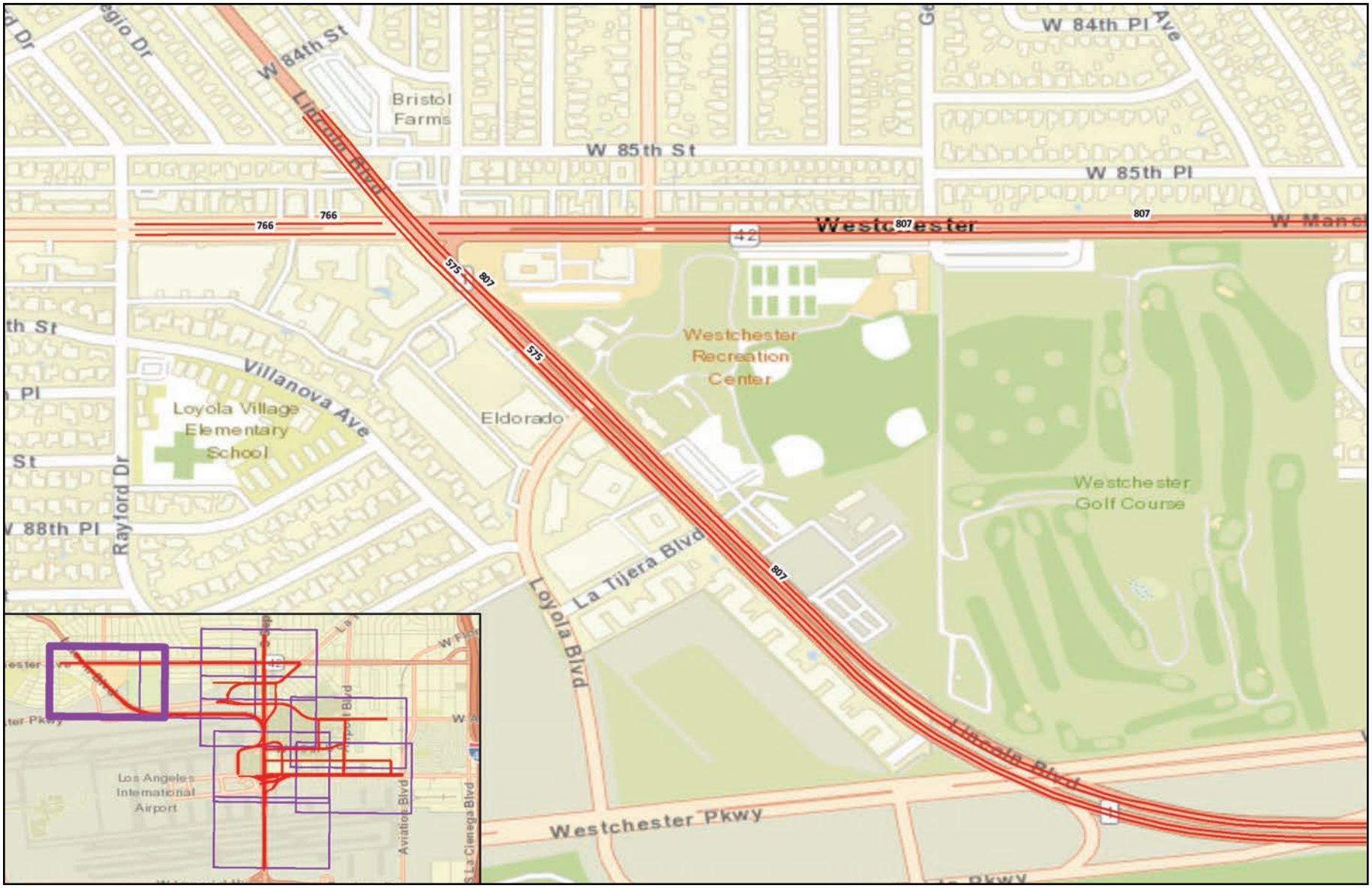
Traffic volumes are indicated on or slightly above roadway for each direction of travel

LAX Airfield and Terminal Modernization Project	Average Daily Traffic (ADT) - Panel 8 of 8 2028 with Project	Figure **2h**



Not to Scale

Sources: HMMH, ESRI, Fehr & Peers, OpenStreetMap, May 2021

Prepared by: CDM Smith, June 2021

Legend

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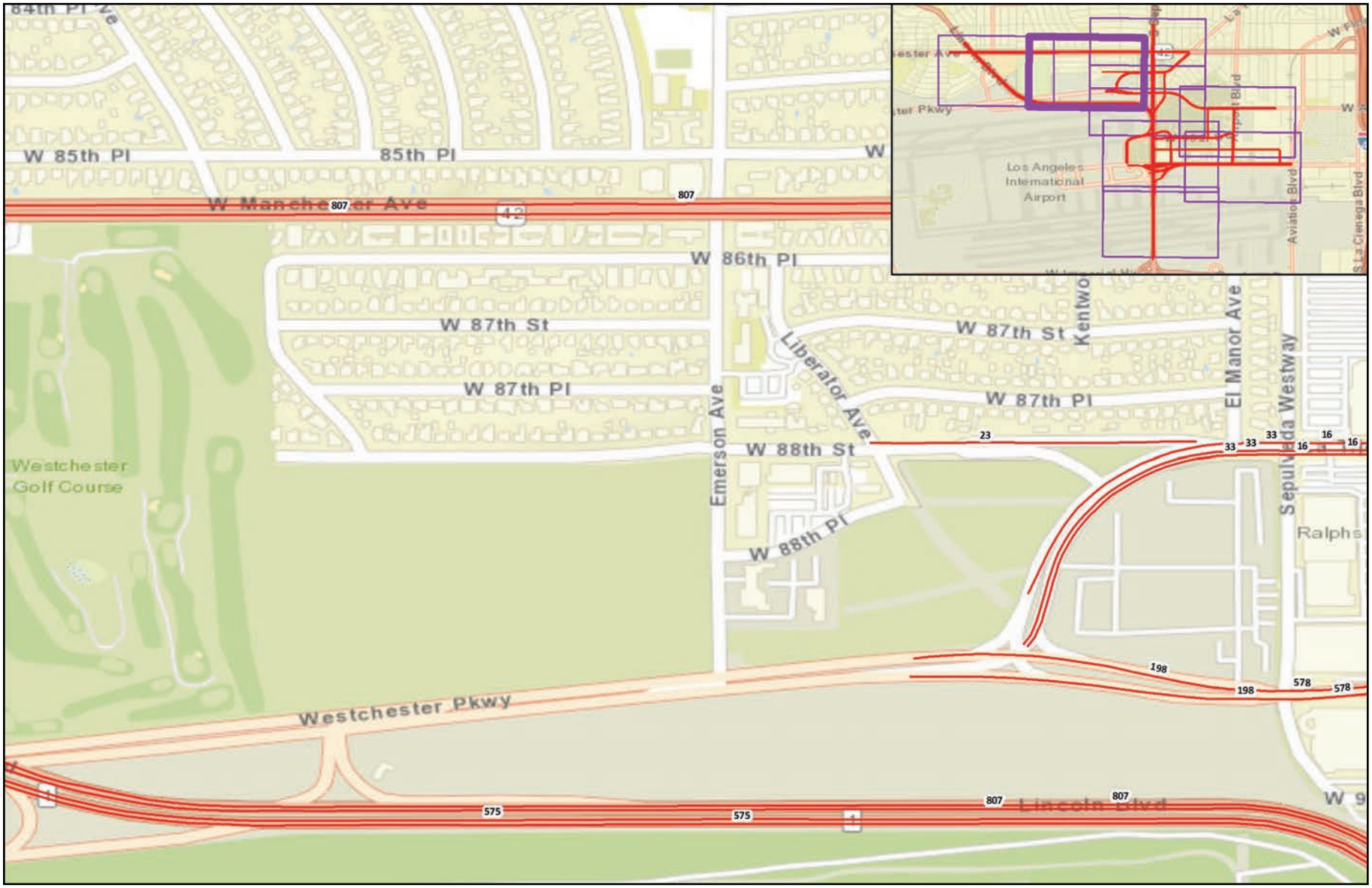
Traffic volumes are indicated on or slightly above roadway for each direction of travel

LAX Airfield and Terminal Modernization Project	Peak Hour Traffic - Panel 1 of 8 2019 Existing Conditions	Figure **3a**



Not to Scale

Sources: HMMH, ESRI, Fehr & Peers, OpenStreetMap, May 2021

Prepared by: CDM Smith, June 2021

Legend

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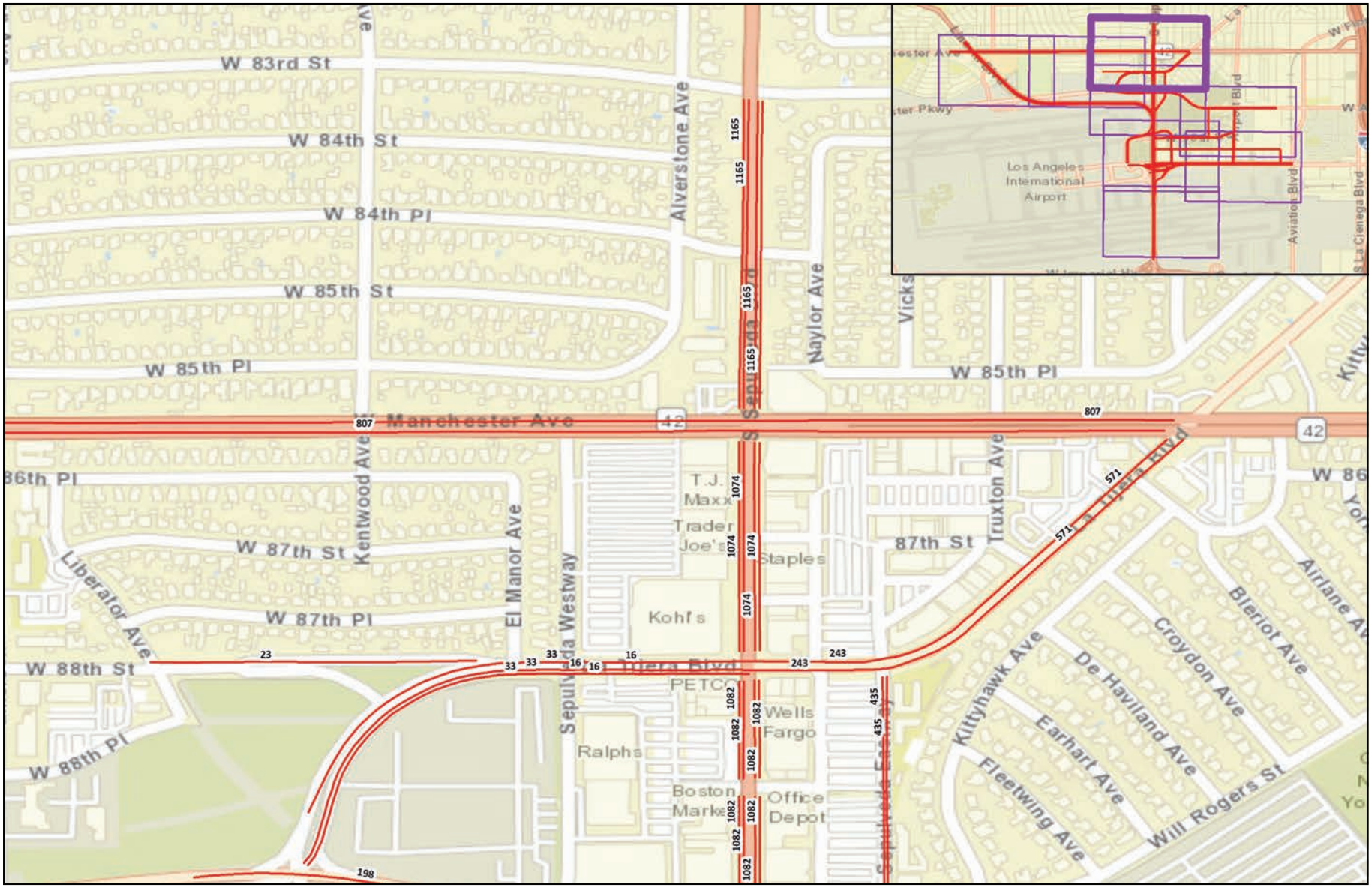
Traffic volumes are indicated on or slightly above roadway for each direction of travel

LAX Airfield and Terminal Modernization Project	Peak Hour Traffic - Panel 2 of 8 2019 Existing Conditions	Figure **3b**



Not to Scale

Sources: HMMH, ESRI, Fehr & Peers, OpenStreetMap, May 2021

Prepared by: CDM Smith, June 2021

Legend

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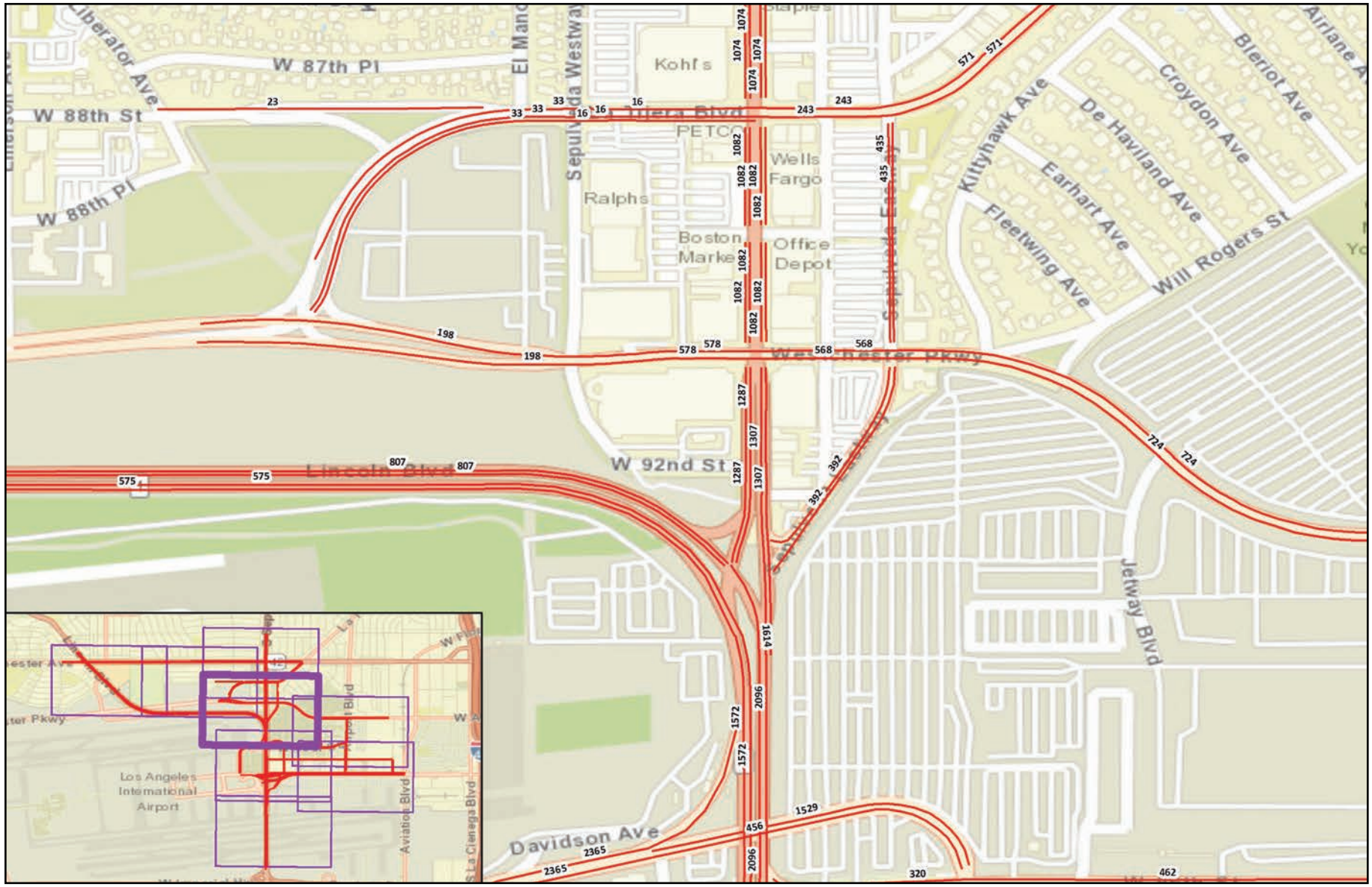
Traffic volumes are indicated on or slightly above roadway for each direction of travel

LAX Airfield and Terminal Modernization Project	Peak Hour Traffic - Panel 3 of 8 2019 Existing Conditions	Figure **3c**



Not to Scale

Sources: HMMH, ESRI, Fehr & Peers, OpenStreetMap, May 2021

Prepared by: CDM Smith, June 2021

Legend

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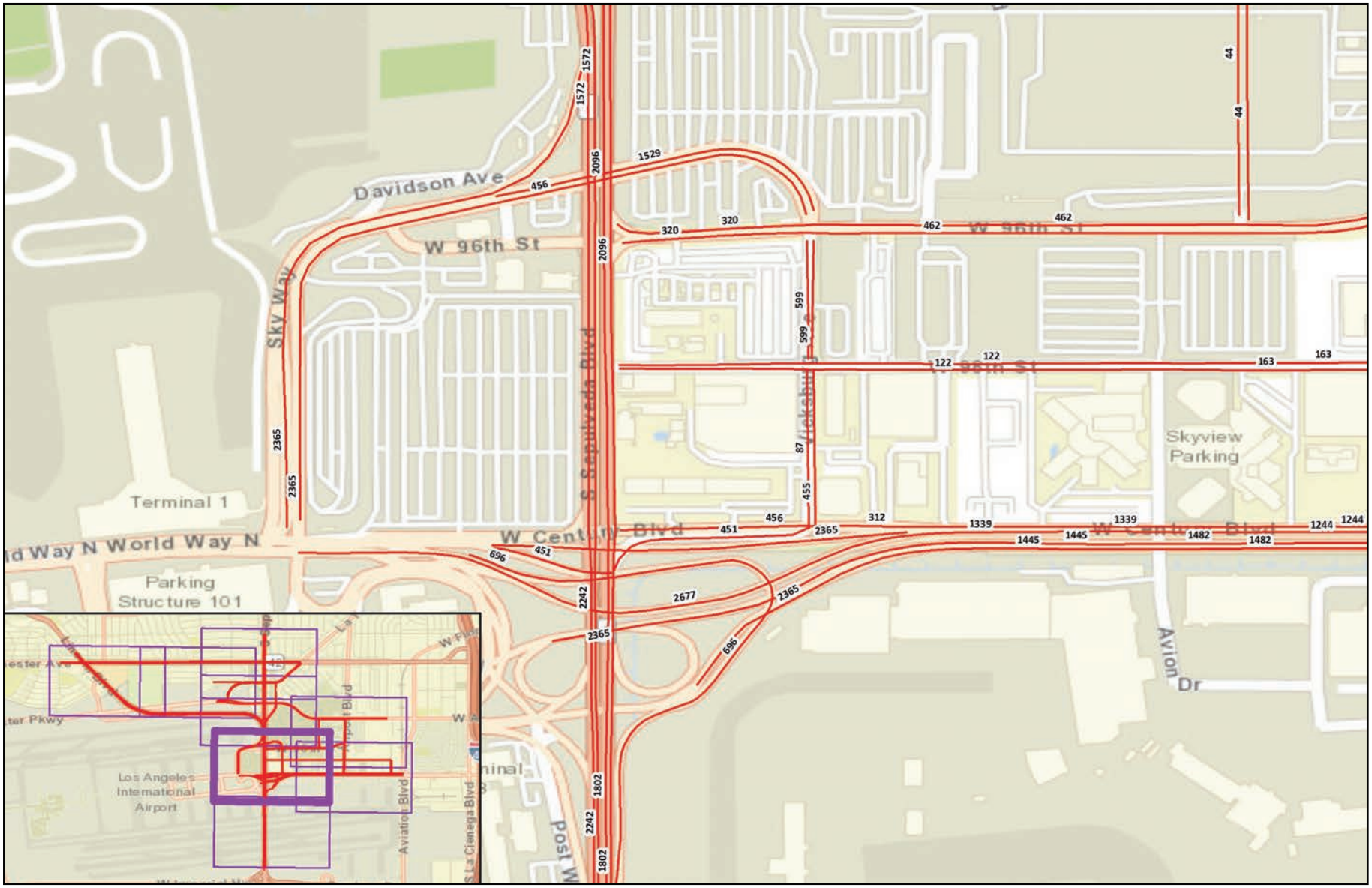
Traffic volumes are indicated on or slightly above roadway for each direction of travel

LAX Airfield and Terminal Modernization Project	Peak Hour Traffic - Panel 4 of 8 2019 Existing Conditions	Figure **3d**



Not to Scale

Sources: HMMH, ESRI, Fehr & Peers, OpenStreetMap, May 2021

Prepared by: CDM Smith, June 2021

Legend

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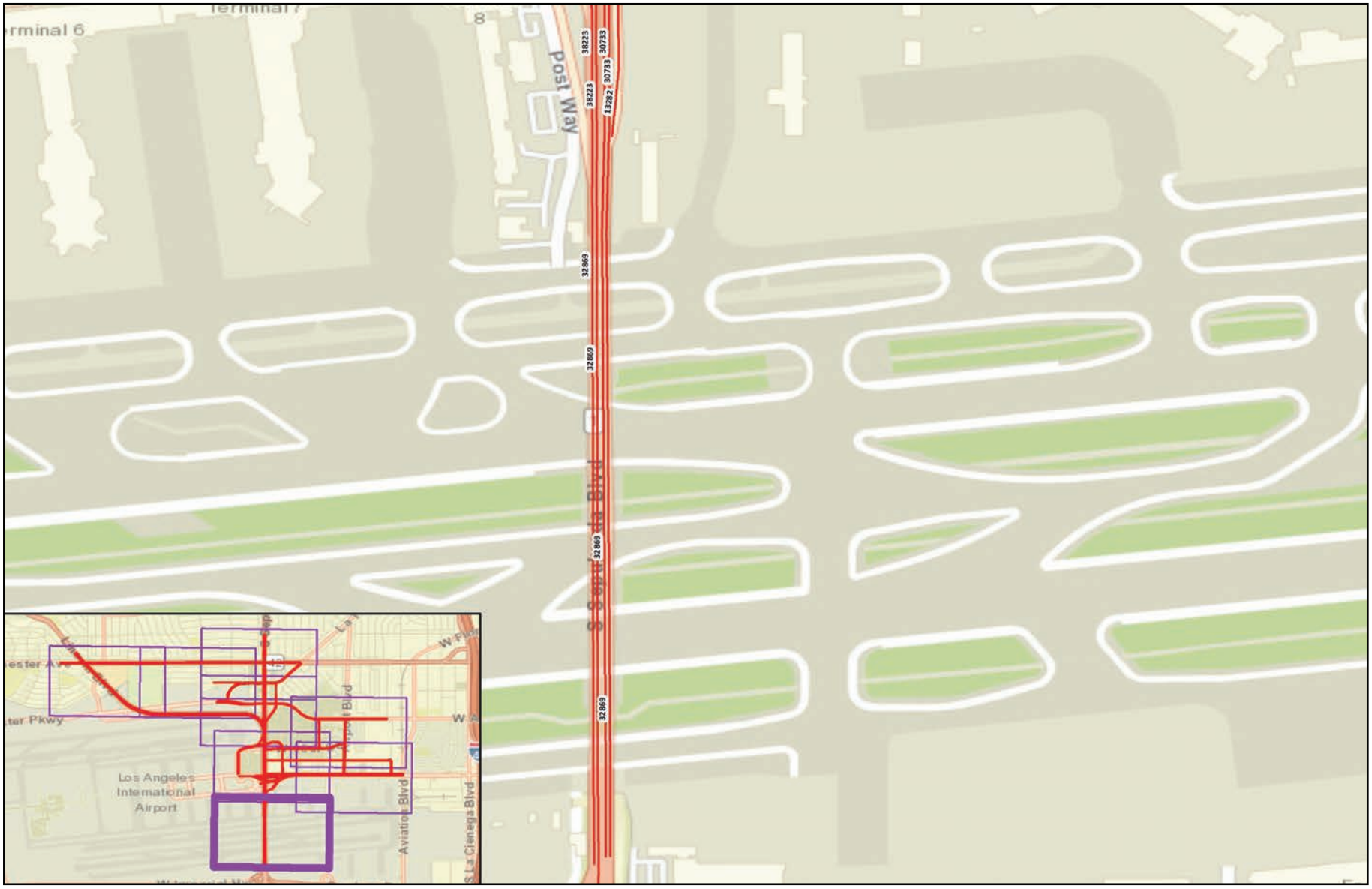
Traffic volumes are indicated on or slightly above roadway for each direction of travel

LAX Airfield and Terminal Modernization Project	Peak Hour Traffic - Panel 5 of 8 2019 Existing Conditions	Figure **3e**



Not to Scale

Sources: HMMH, ESRI, Fehr & Peers, OpenStreetMap, May 2021

Prepared by: CDM Smith, June 2021

Legend

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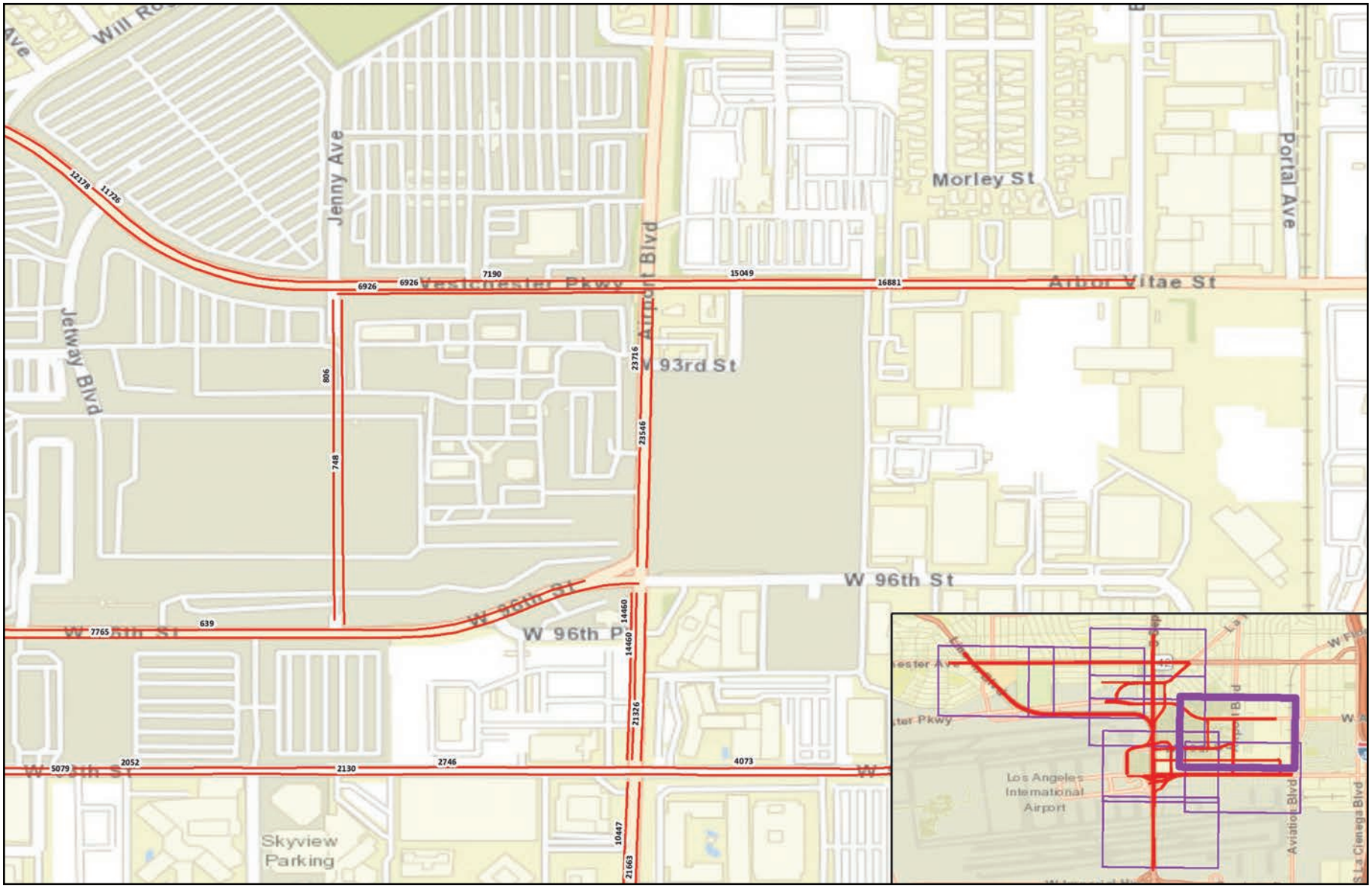
Traffic volumes are indicated on or slightly above roadway for each direction of travel

LAX Airfield and Terminal Modernization Project	Peak Hour Traffic - Panel 6 of 8 2019 Existing Conditions	Figure **3f**



Not to Scale

Sources: HMMH, ESRI, Fehr & Peers, OpenStreetMap, May 2021

Prepared by: CDM Smith, June 2021

Legend

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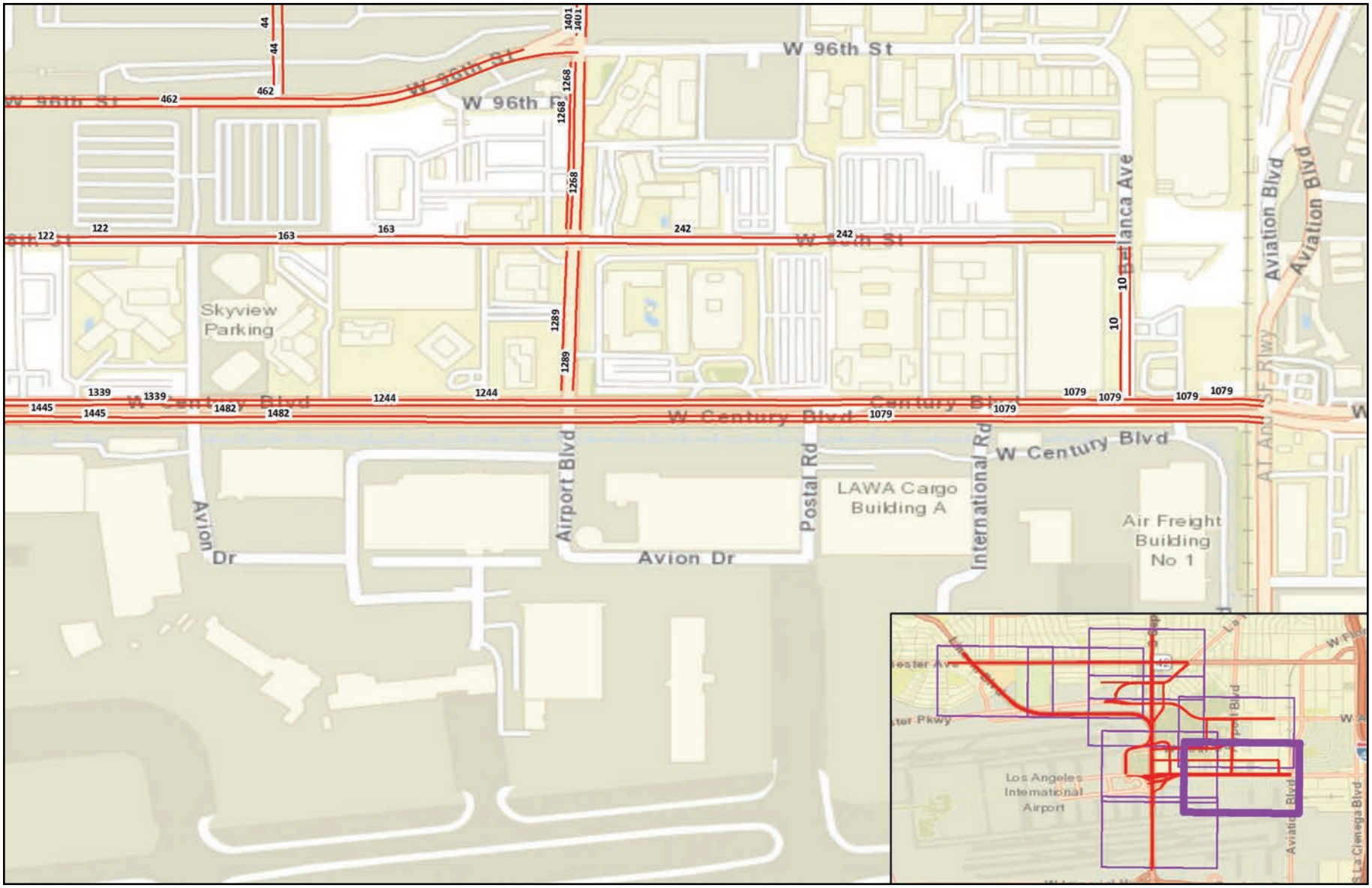
Traffic volumes are indicated on or slightly above roadway for each direction of travel

LAX Airfield and Terminal Modernization Project	Peak Hour Traffic - Panel 7 of 8 2019 Existing Conditions	Figure **3g**



Not to Scale

Sources: HMMH, ESRI, Fehr & Peers, OpenStreetMap, May 2021

Prepared by: CDM Smith, June 2021

Legend

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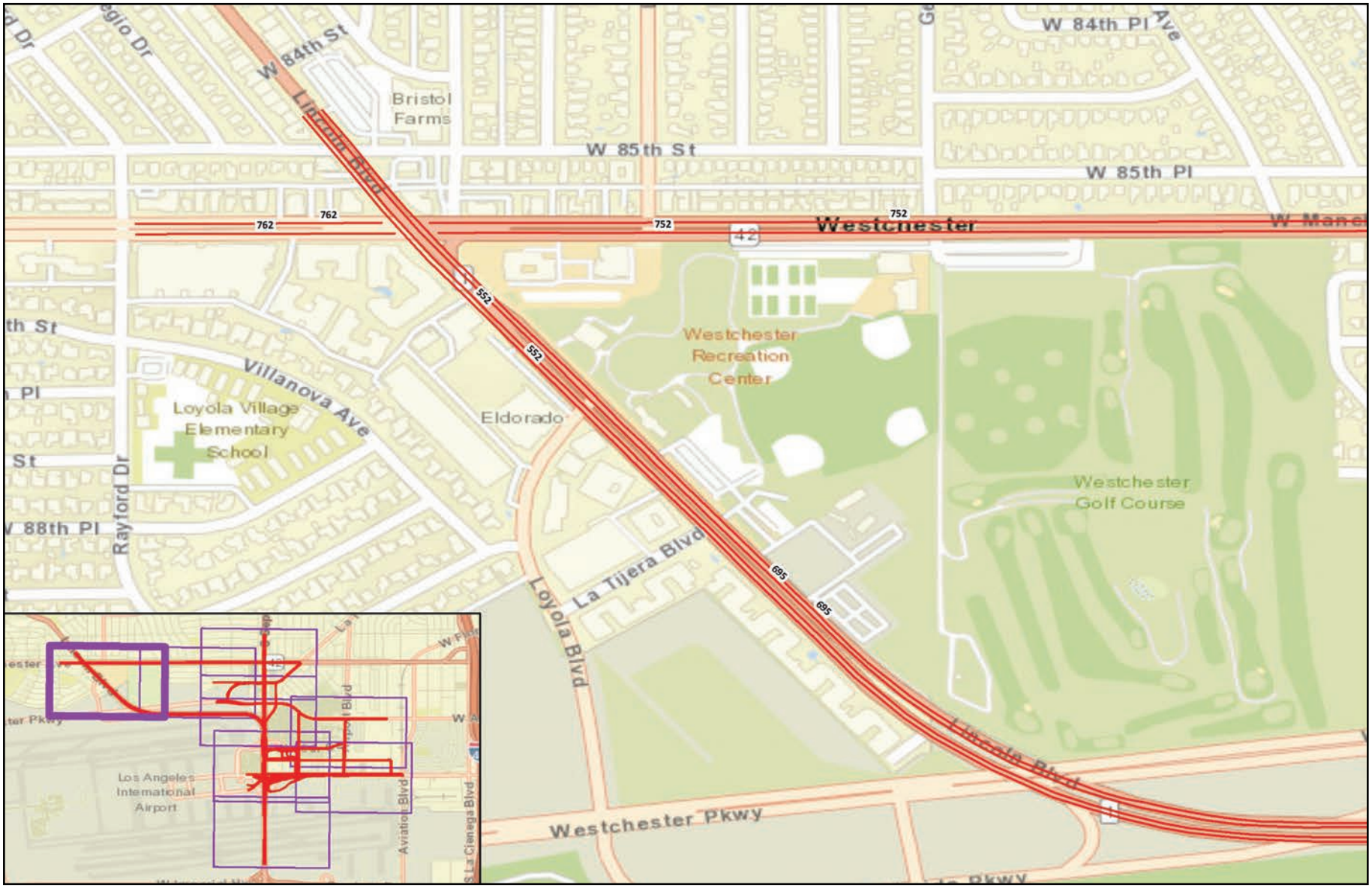
Traffic volumes are indicated on or slightly above roadway for each direction of travel

LAX Airfield and Terminal Modernization Project	Peak Hour Traffic - Panel 8 of 8 2019 Existing Conditions	Figure **3h**



Not to Scale

Sources: HMMH, ESRI, Fehr & Peers, OpenStreetMap, May 2021

Prepared by: CDM Smith, June 2021

Legend

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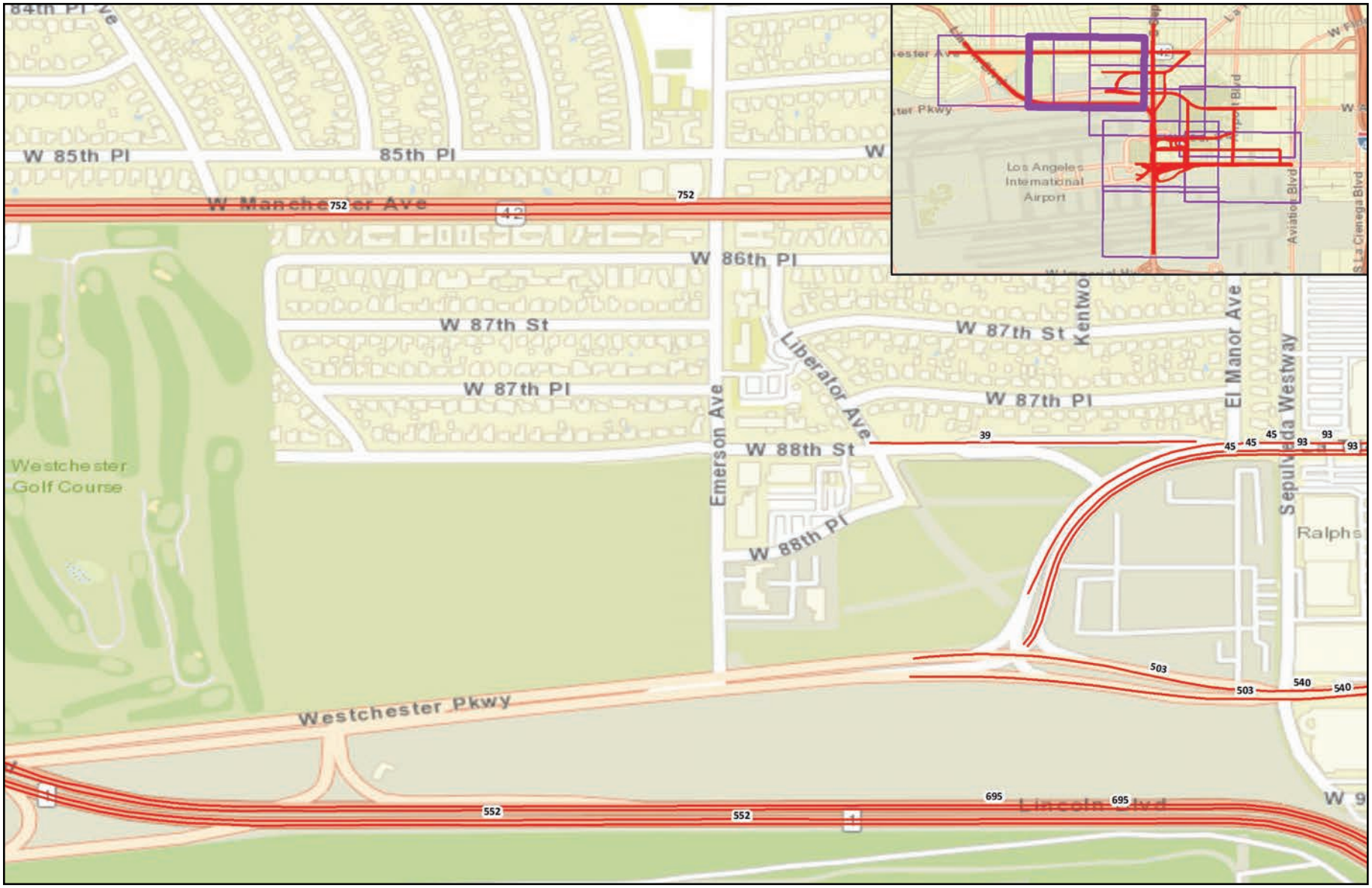
Traffic volumes are indicated on or slightly above roadway for each direction of travel

LAX Airfield and Terminal Modernization Project	Peak Hour Traffic - Panel 1 of 8 2028 with Project	Figure **4a**



Not to Scale

Sources: HMMH, ESRI, Fehr & Peers, OpenStreetMap, May 2021

Prepared by: CDM Smith, June 2021

Legend

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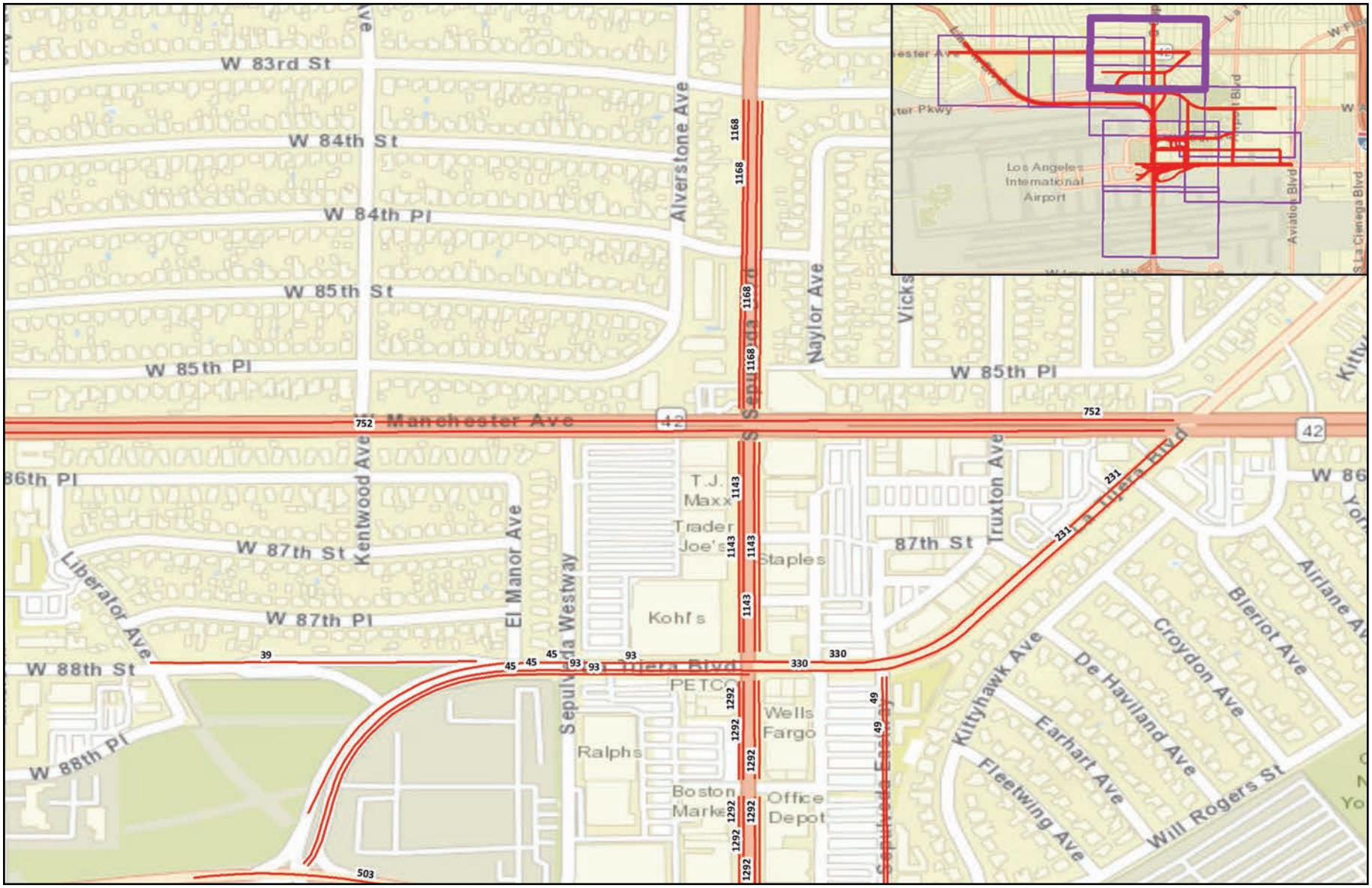
Traffic volumes are indicated on or slightly above roadway for each direction of travel

LAX Airfield and Terminal Modernization Project	Peak Hour Traffic - Panel 2 of 8 2028 with Project	Figure **4b**



Not to Scale

Sources: HMMH, ESRI, Fehr & Peers, OpenStreetMap, May 2021

Prepared by: CDM Smith, June 2021

Legend

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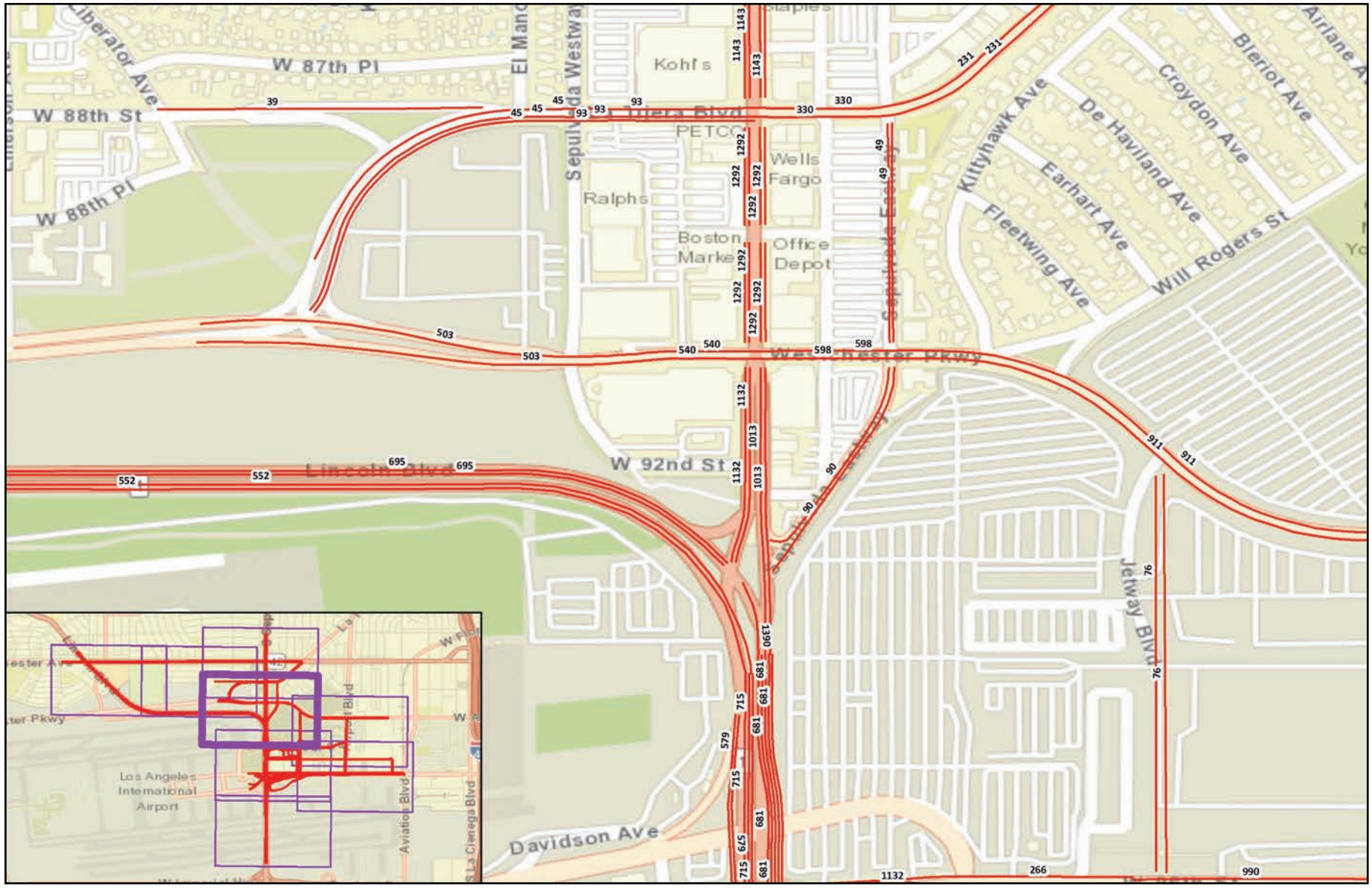
Traffic volumes are indicated on or slightly above roadway for each direction of travel

LAX Airfield and Terminal Modernization Project	Peak Hour Traffic - Panel 3 of 8 2028 with Project	Figure **4c**



Not to Scale

Sources: HMMH, ESRI, Fehr & Peers, OpenStreetMap, May 2021

Prepared by: CDM Smith, June 2021

Legend

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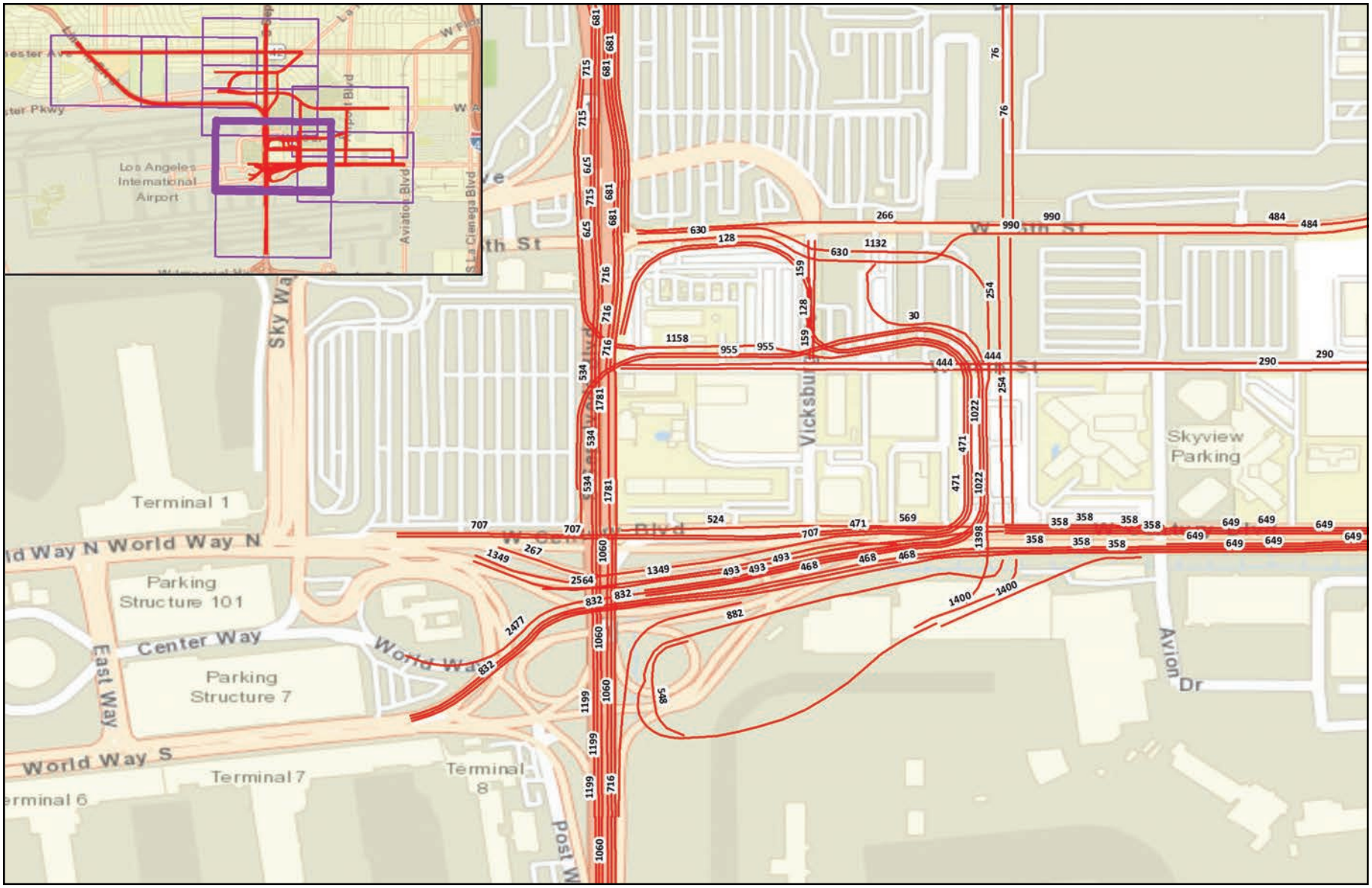
Traffic volumes are indicated on or slightly above roadway for each direction of travel

LAX Airfield and Terminal Modernization Project	Peak Hour Traffic - Panel 4 of 8 2028 with Project	Figure **4d**



Not to Scale

Sources: HMMH, ESRI, Fehr & Peers, OpenStreetMap, May 2021

Prepared by: CDM Smith, June 2021

Legend

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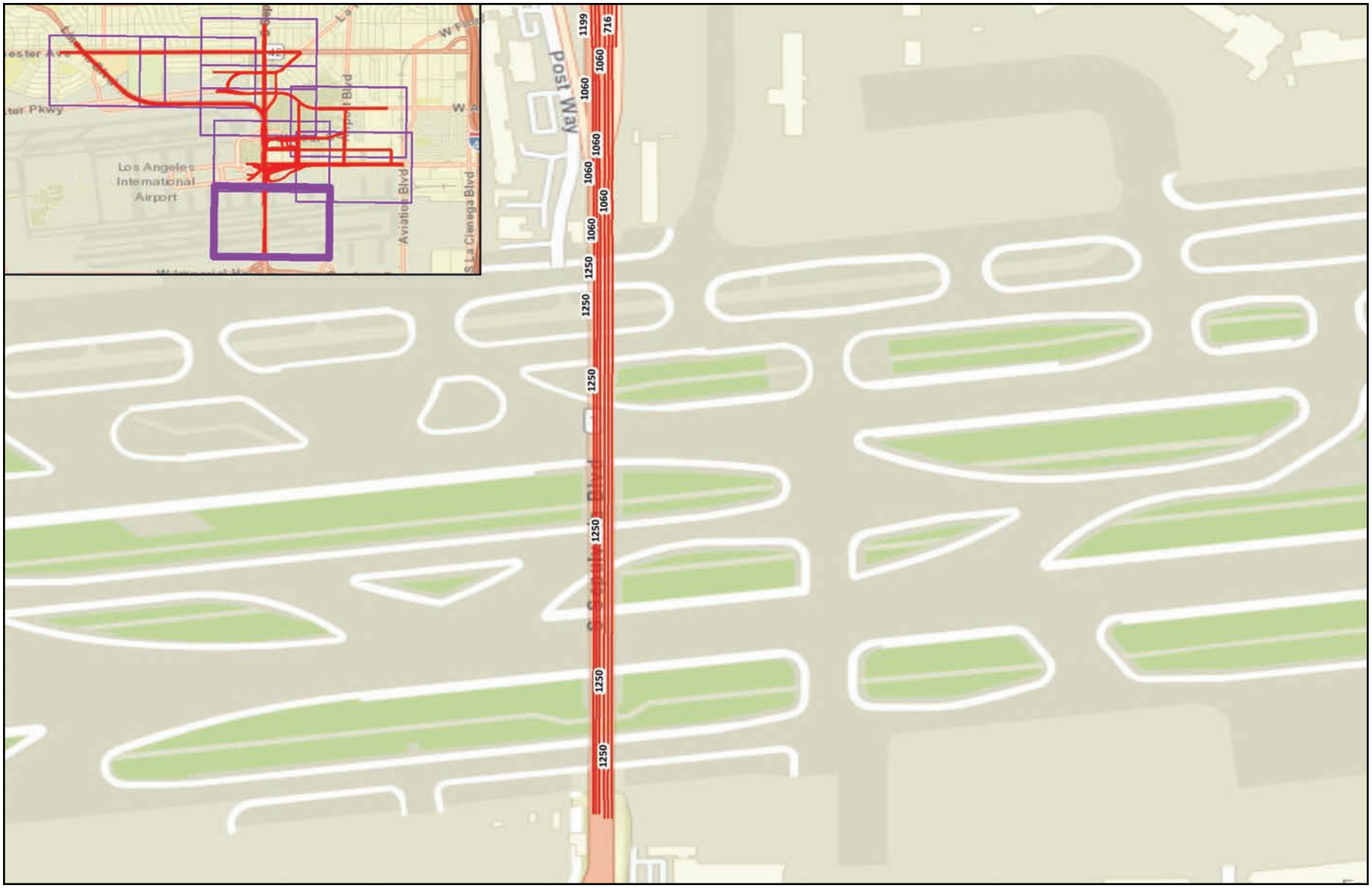
Traffic volumes are indicated on or slightly above roadway for each direction of travel

LAX Airfield and Terminal Modernization Project	Peak Hour Traffic - Panel 5 of 8 2028 with Project	Figure **4e**



Not to Scale

Sources: HMMH, ESRI, Fehr & Peers, OpenStreetMap, May 2021

Prepared by: CDM Smith, June 2021

Legend

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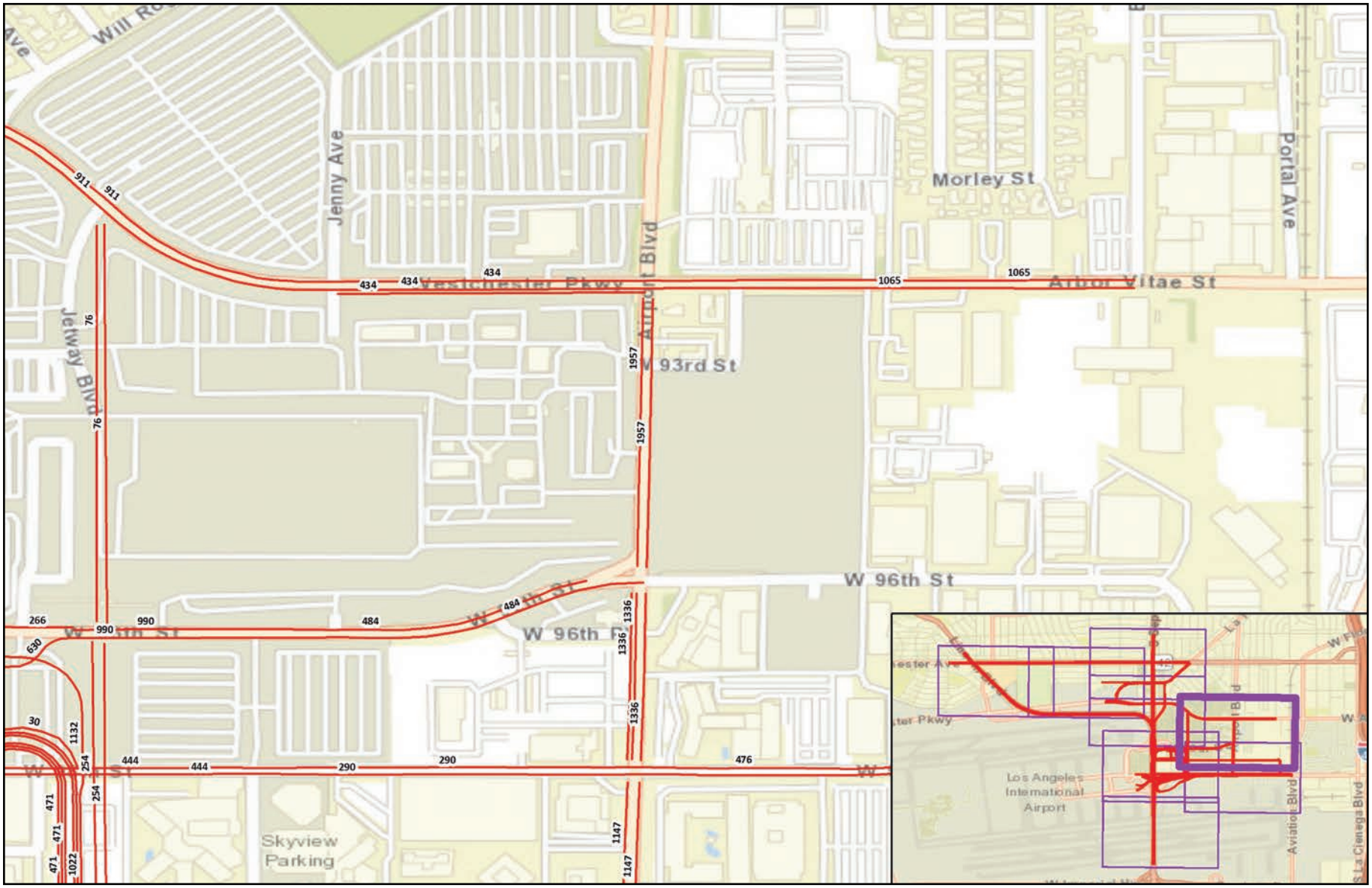
Traffic volumes are indicated on or slightly above roadway for each direction of travel

LAX Airfield and Terminal Modernization Project	Peak Hour Traffic - Panel 6 of 8 2028 with Project	Figure **4f**



Not to Scale

Sources: HMMH, ESRI, Fehr & Peers, OpenStreetMap, May 2021

Prepared by: CDM Smith, June 2021

Legend

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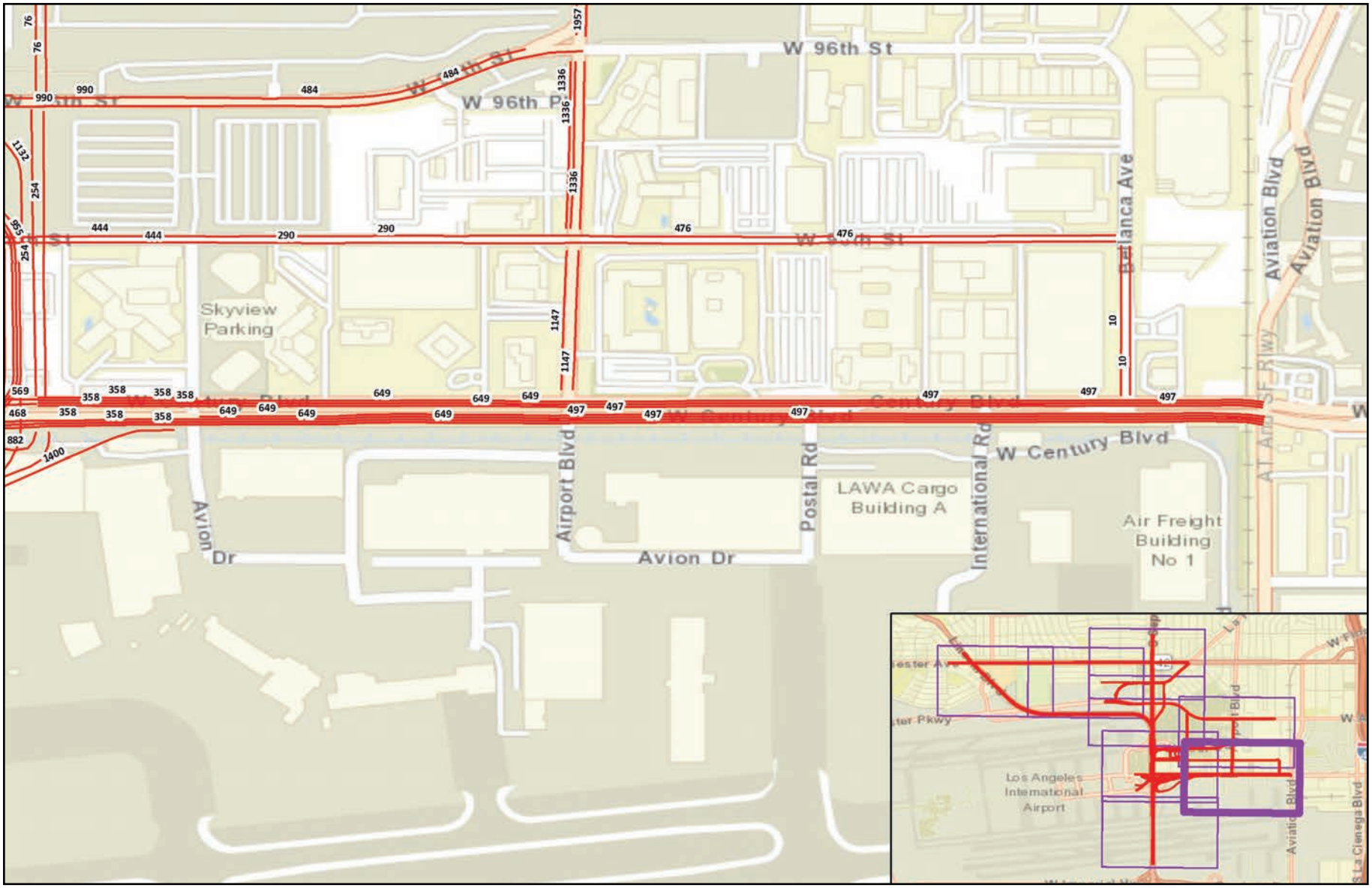
Traffic volumes are indicated on or slightly above roadway for each direction of travel

LAX Airfield and Terminal Modernization Project	Peak Hour Traffic - Panel 7 of 8 2028 with Project	Figure **4g**



Not to Scale

Sources: HMMH, ESRI, Fehr & Peers, OpenStreetMap, May 2021

Prepared by: CDM Smith, June 2021

Legend

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Traffic volumes are indicated on or slightly above roadway for each direction of travel

LAX Airfield and Terminal Modernization Project	Peak Hour Traffic - Panel 8 of 8 2028 with Project	Figure **4h**

ATMP-PC035-73

Comment: Air Quality

Inadequate Analysis of Architectural Coating Emissions

The Air Quality, Human Health Risk Assessment, Greenhouse Gas Emissions, and Energy ("AQ & GHG Report"), provided as Appendix C to the DEIR, estimates that architectural coating activities associated with the proposed Concourse 0 East Interior Fit-Out, Concourse 0 West Interior Fit-Out, Terminal 9 East Fit-Out, and Terminal 9 West Fit-Out would result in VOC emissions of 12-, 16-, 13-, and 13-pounds per day ("lbs/day"), respectively (Appendix C, pp. 29). However, the AQ & GHG Report's analysis of the Project's architectural coating-related VOC emissions is unsubstantiated, as it relies upon an underestimated Concourse 0 land use size.

Specifically, the DEIR indicates that Concourse 0 would include 745,000-SF of concourse/passenger operations and 318,000-SF of office space for admnistrative purposes, thus resulting an a total alnd use size of 1,063,000-SF (p. 1-6). As such, the AQ & GHG Report's analysis of the Project's architectural coating emissions should have relied upon a land use size of 1,063,000-SF for Concourse 0. However, review of the AQ & GHG Report demosntrates that the analysis assumes that Concourse 0 East and Concourse 0 West would each only be 372,500-SF, for a total of 745,00-SF (see excerpt below) (Appendix C, pp. 29).

Project #	Project Description	Total Building Area (sqft)
23	C0 East Interior Fit-Out	372,500
42	C0 West Interior Fit-Out	372,500
72	Terminal 9 East Fit-Out	800,345
86	Terminal 9 West Fit-Out	800,345

As demonstrated above, the analysis of Concourse 0 fails to include the proposed office space, underestimatig the land use size by 318,000-SF. As a result, the AQ & GHG Report's analysis of the Project's architectural coating emissions is inconsistent with the information provided by the DEIR. Thus, by underestimating the size of Concourse 0, the AQ & GHG Report underestimates the VOC emissions associated with the Project's architectural coating activities and should not be relied upon to determine Project significance.

Response: The commenter states that fugitive volatile organic compound (VOC) emissions presented in Appendix C.1 for the "C0 [Concourse 0] East Interior Fit-Out" and "C0 West Interior Fit-Out" Project components were underrepresented; specifically, that the calculation of VOC emissions did not account for potential addition of 318,000 square feet of office space, as identified in Section 2.4.2.1. The commenter is correct that the 318,000 square feet of office space was inadvertently not included in the construction emissions calculations. As discussed below, the calculations were corrected and accurately reflect expected emissions levels.

Prior to, and independent from, comments received on the Draft EIR, LAWA reevaluated the construction start date for the proposed Project in light of the status of the CEQA

and the NEPA environmental reviews of the proposed Project and determined that a January 2022 start date was more reasonable than an April 2021 construction start date. As a result of this refinement, Project-related construction emissions were reevaluated. The updated construction emissions calculations, including the revised calculations related to architectural coatings, were based on the total floor areas noted in the Draft EIR: 1,275,600 square feet for Concourse 0, which includes the additional 318,000 square feet of office area (see Concourse 0 total square footage indicated on page 2-24 of the Draft EIR), and 1,413,600 square feet for Terminal 9 (see Terminal 9 total square footage indicated on page 2-28 of the Draft EIR). In addition, as discussed below, the refined construction-related fugitive VOC emissions calculations assumed the use of architectural coatings in compliance with SCAQMD Rule 1113.[1] Please see Chapter F3, Corrections and Clarifications to the Draft EIR, for the refined construction emissions, including revised VOC emissions for the correct square footages for architectural coatings noted above. As shown in Chapter F3, none of the refined peak day construction emissions would exceed the peak day construction emissions presented in Table 4.1.1-8 of the Draft EIR; therefore, no new air quality significant impacts were identified.

The construction-related fugitive VOC emissions calculations presented in Appendix C.1 and throughout the Draft EIR were extremely conservative estimates of actual expected Project-related emissions. The methodology employed for the proposed Project construction emission calculations was based on CalEEMod default building area assumptions. The CalEEMod User Guide version 2016.3.2 assumes a total surface coating factor of 2 times the floor square footage.[2] While appropriate for a typical general office structure, this assumption is very conservative for, and not representative of, airport terminals, which have expansive open spaces devoted to non-office activities, such as ticketing, baggage claim, concourses, and, in particular, large open areas for passengers to sit while waiting to board aircraft. For example, for the LAX Terminal 1.5 Project Final Initial Study/Mitigation Negative Declaration,[3] a recently published study for a terminal construction project at LAX inclusive of both terminal space and office space, interior layout and design plans were analyzed to estimate the actual total surface coating area. The analysis concluded that the actual total surface coating area would be less than half of the default CalEEMod assumption. The Terminal 1.5 analysis included 146,000 square feet of office space and 272,000 square feet of typical terminal space; approximately 35 percent of the total addition would be office space. The office space in Concourse 0 would be approximately 30 percent of the total area, a comparable ratio to Terminal 1.5. The proposed Project analysis made no corrections to the estimated architectural coating emission estimates to account for the installation of non-coated glass windows and skylights, which would be prevalent throughout the design of Concourse 0 and Terminal 9. Therefore, the use of the CalEEMod total surface coating factor contributed to the conservative nature of the analysis provided in the Draft EIR.

Moreover, the proposed Project fugitive construction calculations assumed a VOC concentration of 250 grams of VOC per liter of coating for architectural construction coatings based on USEPA maximum allowable VOC concentrations. In reality, more stringent VOC regulations, promulgated in SCAQMD Rule 1113, restrict VOC concentrations to levels that are far lower than 250 grams of VOC per liter of coating. Although it would be speculative to presume the precise quantity of coatings that would be used during the construction of Concourse 0 and Terminal 9 under each regulated

architectural coating category, Table 1 presents the most applicable regulated coating categories to terminal construction and their respective regulated VOC concentration limits. As shown, the most applicable VOC concentration limits for architectural coatings related to the construction of Concourse 0 and Terminal 9 range from 50 to 150 grams of VOC per liter of coating (40 percent to 80 percent lower than the coating VOC concentration assumed for the architectural coating calculations in the Draft EIR). Therefore, inclusion of low-VOC architectural coatings in the refined emissions analysis is supported by substantial evidence.

Table 1.
SCAQMD Rule 1113 VOC Limits
Potentially Applicable to Project Construction

Architectural Coating Category	VOC Limit
Building Envelope Coatings	100
Concrete-Curing Compounds	100
Concrete Surface Retarders	50
Default	50
Fire-Proofing Coatings	150
Flats	50
Floor Coatings	50
Nonflat Coatings	50
Primers, Sealers, and Undercoaters	100
Roof Coatings	50
Rust Preventative Coatings	100
Waterproofing Sealers	100
Waterproofing Concrete/Masonry Sealers	100

In addition to these considerations, Mitigation Measure MM-GHG (ATMP)-3 calls for LAWA to develop and adopt a Green Procurement Policy, which would apply to the proposed Project. The policy would require LAWA to identify requirements and standards for products (including architectural coatings) that have a reduced effect on human health and the environment when compared with competing products and services that serve the same purpose. This measure would serve to further ensure that low-VOC architectural coatings would be considered throughout construction of Concourse 0 and Terminal 9 in lieu of higher VOC alternatives.

For the reasons described above, the VOC emissions resulting from the construction of Concourse 0 and Terminal 9 would be lower than initially estimated in the Draft EIR, and VOC emissions associated with proposed Project architectural coating activities were not underestimated.

[1] South Coast Air Quality Management District, Rule 1113 – Architectural Coatings, amended February 5, 2016. Available: http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf?sfvrsn=17.
[2] California Air Pollution Control Officers Association, California Emissions Estimator Model, Appendix A Calculation Details for CalEEMod, prepared by BREEZE Software in collaboration with the South Coast Air Quality Management District and the California

Air Districts, October 2017. Available: http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf.
[3] City of Los Angeles, Los Angeles World Airports, Final Mitigated Negative Declaration and Initial Study for Los Angeles International Airport (LAX) Terminal 1.5 Project, (Los Angeles City File No. NG-16-275-AD), November 2016. Available: https://www.lawa.org/en/lawa-our-lax/environmental-documents/documents-certified/lax-terminal-15.https://www.lawa.org/en/lawa-our-lax/environmental-documents/documents-certified/lax-terminal-15.

ATMP-PC035-74

Comment: Failure to Adequately Analyze Construction Trips

While the AQ & GHG Report considers the construction-related emissions associated with worker trips, it fails to consider emissions associated with hauling and vendor trips required by Project construction (Appendix C.1, pp. 146-153). This is incorrect, as vendor and hauling, as well as worker, trips result in short-term construction-related emissions associated with on-road vehicles.[1] Thus, by failing to consider the hauling and vendor trips required for Project construction, the AQ & GHG Report underestimates the Project's construction-related emissions and should not be relied upon to determine Project significance.

[1] "CalEEMod User Guide." available at: http://www.caleemod.com/, p. 2.

Response: As described in Section 4.1.1.2.1.3 of the Draft EIR, emissions associated with haul and delivery trips for the transport of various materials to and from the Project site were estimated for each Project component. The Construction Equipment Schedule, presented in Appendix C.1 (PDF pages 48 to 145 of Appendix C) of the Draft EIR, details the estimated total work hours needed for each unit of equipment to complete each Project component, including equipment identified as concrete, flat bed, hauling, and delivery trucks. Emissions associated with the equipment listed in the Construction Equipment Schedule, including concrete, flat bed, hauling, and delivery trucks, were estimated using the most applicable OFFROAD2017 or EMFAC2017 emission factors, presented in the Equipment Parameters section of Appendix C.1 (PDF pages 19 and 20 of Appendix C) of the Draft EIR. Therefore, hauling and vendor activity were included in the construction analysis. The air quality and greenhouse gas analyses did not underestimate the Project's construction-related emissions; these analyses were appropriately relied upon to determine the impacts of the proposed Project.

ATMP-PC035-75

Comment: Failure to Evaluate All Operational Emission Sources

Regarding the Project's operational emissions, the DEIR states:

"Sources of operational emissions evaluated in the analysis include aircraft engines and auxiliary power units (APUs); ground support equipment (GSE); ground vehicles used to transport passengers, cargo, and supplies to and from the airport; stationary water and space heaters; emergency generators; and indirect GHG emissions from electrical demand" (p. 4.4-5).

However, the DEIR's analysis of the Project's operational emissions fails to take into account emissions associated with water usage and solid waste disposal.[2] This presents an issue, as supplying and treating water, as well as disposing of solid waste, throughout Project operation contributes to operational greenhouse gas ("GHG") emissions.[3] Thus, by failing to consider emissions associated with solid waste and water, the AQ & GHG Report underestimates the Project's operational GHG emissions and should not be relied upon to determine Project significance.

[2] "CalEEMod User Guide." available at: http://www.caleemod.com/, p. 2.
[3] "CalEEMod User Guide." available at: http://www.caleemod.com/, p. 44, 46.

Response: The content of this comment is similar to comment ATMP-AL010-172; please refer to Response to Comment ATMP-AL010-172.

ATMP-PC035-76

Comment: Failure to Implement All Feasible Mitigation to Reduce Emissions
As discussed above, the DEIR relies upon an unsubstantiated analysis of the Project's emissions. However, despite the DEIR's flawed emissions analysis, the DEIR's construction-related and operational emissions estimates indicate a significant air quality impact. Specifically, regarding the Project's construction-related criteria air pollutant emissions, the DEIR states:

"With implementation of Mitigation Measures MM-AQ/GHG (ATMP)-1 and 2, significant impacts associated with construction emissions would be reduced, but not to a level that would be less than significant. Specifically, even with implementation of all feasible construction-related mitigation measures, the proposed Project-related estimated incremental increases in construction-related emissions of CO, VOC, NOX, and SOX would exceed the daily emission thresholds established by SCAQMD. The emissions of CO, VOC, and SOX would exceed the construction emission thresholds during the periods when one of the north runways is closed to safely tie-in the Taxiway D extension. The runway closure period would require aircraft to taxi farther to the open runways. Once these connections are completed, taxi times would drop and would be similar to Without Project taxi times. Although these runway closures would be temporary (approximately 4 to 5 months in two different years) relative to the total proposed Project construction duration, they do represent peak day total construction emissions for all pollutants. Construction emissions of NOX would exceed the construction emission thresholds in several years that do not include the runway closures. No other feasible mitigation measures have been identified that would further reduce these impacts to air quality. Therefore, impacts to air quality from Project-related construction emissions would be significant and unavoidable" (p. 4.1.1-43 – 4.1.1-44).

Furthermore, regarding the Project's operational criteria air pollutant emissions, the DEIR states:

"With implementation of Mitigation Measures MM-AQ/GHG (ATMP)-3 through 7 and MM-T (ATMP)-1, significant impacts associated with operational emissions would be reduced, but not to a level that would be less than significant. Specifically, even with implementation of all feasible operations-related mitigation measures, the Project-related estimated incremental increases in daily operations-related emissions of NOX, SOX, PM10, and PM2.5 would exceed the daily emission thresholds established by SCAQMD. No other feasible mitigation measures have been identified at this time that would further reduce impacts to air quality. Therefore, impacts to air quality from Project-related operational emissions would be significant and unavoidable" (p. 4.1.1-50).

However, while we agree that the Project's construction-related and operational criteria air pollutant emissions would result in significant air quality impacts, the DEIR's conclusion that these impacts are "significant and unavoidable" is incorrect. According to CEQA Guidelines § 15096(g)(2):

"When an EIR has been prepared for a project, the Responsible Agency shall not approve the project as proposed if the agency finds any feasible alternative or feasible mitigation measures within its powers that would substantially lessen or avoid any significant effect the project would have on the environment."

As you can see, an impact can only be labeled as significant and unavoidable after all available, feasible mitigation is considered. However, while the DEIR includes MM-AQ/GHG (ATMP)-1 through 7, as well as MM-T (ATMP)-1, the DEIR fails to implement all feasible mitigation (p. 4.1.1-43, 4.1.1-49). Therefore, the DEIR's conclusion that the Project's air quality impacts are significant and unavoidable is unsubstantiated. To reduce the Project's air quality impacts to the maximum extent possible, additional feasible mitigation measures should be incorporated, such as those suggested in the section of this letter titled "Feasible Mitigation Measures Available to Reduce Emissions."[4] Thus, the Project should not be approved until an updated EIR is prepared, including updated, accurate air modeling, as well as incorporating all feasible mitigation to reduce emissions to less-than-significant levels.

[4] See section titled "Feasible Mitigation Measures Available to Reduce Emissions" on p. 12 of this comment letter. These measures would effectively reduce construction-related and operational criteria air pollutant emissions.

Response: This comment refers to the mitigation measures proposed by the commenter in comments ATMP-PC035-86 through ATMP-PC035-97, which are each addressed in Topical Response TR-ATMP-AQ/GHG-1. Please refer to Topical Response TR-ATMP-AQ/GHG-1. As discussed on page 4.4-33 in Section 4.4 and Appendix C.9 of the Draft EIR, LAWA reviewed over 90 possible mitigation measures to determine if they were already being implemented at LAX, were proposed to be included in the proposed Project as a

design/operation feature or as a Project mitigation measure, or were considered to be not applicable to, or infeasible for, the proposed Project. Contrary to the commenter's assertion, the Draft EIR does not exclude any mitigation measures that could feasibly be implemented to address significant air quality impacts.

ATMP-PC035-77

Comment: Diesel Particulate Matter Health Risk Emissions Inadequately Evaluated
The DEIR concludes that the Project's health risk impacts would be less-than-significant as a result of quantitative construction and operational health risk assessments ("HRAs") (p. 4.1.2-14, 4.1.2-16). Specifically, the DEIR estimates the following cumulative cancer risks (see excerpt below) (p. 4.1.2-14, Table 4.1.2-2):

Table 4.1.2-2
Incremental Cancer Risks for Maximally Exposed Individuals during Combined With Project Construction and Operational Periods

Receptor Type	Cancer Risks[1,2,3,4] (per million people)	Threshold (per million people)	Equal to or Exceeds Threshold?
Off-Airport Worker, 25 years	5	10	No
Adult Resident, 70 years	-2	10	No
Adult Resident, 30 years	-1	10	No
Child Resident, 9 years	-0.1	10	No
School Child, 12 years	-0.2	10	No

However, the DEIR's analysis of the Project's health risk impacts, as well as the subsequent less-than-significant impact conclusion, is incorrect for three reasons.

First, the DEIR's analysis of the Project's toxic air contaminant ("TAC") emissions is incorrect, as it relies upon a flawed analysis of the Project's emissions. As previously discussed, when we reviewed the DEIR's analysis of the Project's emissions, provided in the AQ & GHG Report as Appendix C to the DEIR, we found several inadequacies, as well as inconsistencies with the information disclosed in the DEIR and associated documents. As a result, the DEIR's HRA utilizes underestimated TAC emissions estimates to calculate the cancer risk associated with Project construction and operation. As a result, the DEIR may underestimate the Project's construction-related and operational cancer risks and should not be relied upon to determine Project significance.

Response: As stated in Appendix C.6, Human Health Risk Assessment Technical Report, of the Draft EIR, "[t]he human health risk assessment (HHRA) presented in this technical appendix estimates cancer risks, chronic (long-term) non-cancer health hazards, and acute (short-term) non-cancer health hazards associated with exposure to toxic air contaminants (TAC) that would be emitted during construction and operation of the Los Angeles International Airport (LAX) Airfield and Terminal Modernization Project (proposed Project)." The HHRA was developed as required under State of California statutes and regulations,[1] and was conducted as defined in SCAQMD, CalEPA, and USEPA guidance [2,3,4]. The methodology for the HHRA is documented in the LAX Airfield and Terminal Modernization Project CEQA Protocol for Conducting an Air Quality Impact Analysis for Criteria Air Pollutants, Final Supplement 1 – Human Health Risk Assessment Methodology to the CEQA Protocol, which was presented to SCAQMD prior to the

initiation of the HHRA and is included in Appendix C.8, Modeling Protocols, of the Draft EIR. The health risks were based on concentrations of TAC estimated using dispersion modeling of emissions associated with construction and operation of the proposed Project to downwind receptor locations within the study area around the airport, as defined in the modeling protocols in Appendix C.8 of the Draft EIR. Modeled concentrations were used to estimate human health risks and hazards, which were the basis of the significance determinations for the proposed Project.

As noted in Section 3 of Appendix C.6, diesel particulate matter (DPM) is one of the TAC modeled in the dispersion modeling of emissions and analyzed in the human health risk assessment. Emissions of DPM during the construction phase are expected to contribute the majority of total incremental cancer risks from the proposed Project.

With respect to the contribution of regional air quality to diesel exhaust in the South Coast Air Basin, please see Response to Comment ATMP-PC035-25.

With respect to health effects in the surrounding communities and emissions from LAX, please see Response to Comment ATMP-PC028-4.

With respect to adequacy of the air pollutant emissions analysis, please see Responses to Comments ATMP-PC035-73, ATMP-PC035-74, and ATMP-AL010-172. As described in those responses, architectural coating, construction hauling and vendor truck trips, and air pollutant emissions associated with landscaping and water usage were appropriately included in the air quality impacts analysis and HHRA.

With respect to the other two issues concerning the adequacy of the health risk analysis mentioned in this comment, please see Responses to Comments ATMP-PC035-78 and ATMP-PC035-79 below.

[1] California Environmental Protection Agency, Office of Environmental Health Hazard Assessment, Air Toxics Hot Spots Information and Assessment Act of 1987, Section 44300; California Environmental Protection Agency, Office of Environmental Health Hazard Assessment, Air Toxics Hot Spots Program, Risk Assessment Guidelines, Guidance Manual for Preparation of Health Risk Assessments, February 2015.
[2] South Coast Air Quality Management District, AB 2588 and Rule 1402 Supplemental Guidelines (Supplemental Guidelines for Preparing Risk Assessments for the Air Toxics "Hot Spots" Information and Assessment Act), July 2018. Available: http://www.aqmd.gov/docs/default-source/planning/risk-assessment/ab2588supplementalguidelines.pdf.
[3] California Environmental Protection Agency, Office of Environmental Health Hazard Assessment, Air Toxics Hot Spots Program Risk Assessment Guidelines, Part I: The Determination of Acute Reference Exposure Levels for Airborne Toxicants, March 1999. Available: https://oehha.ca.gov/air/crnr/adoption-air-toxics-hot-spots-risk-assessment-guidelines-part-itechnical-support-document. California Environmental Protection Agency, Office of Environmental Health Hazard Assessment, Air Toxic Hot Spots Program Risk Assessment Guidelines, Technical Support Document for Exposure Assessment and Stochastic Analysis, August 2012. Available: https://oehha.ca.gov/air/crnr/notice-

adoption-technical-support-document-exposure-assessment-andstochastic-analysis-aug. California Environmental Protection Agency, Office of Environmental Health Hazard Assessment, Air Toxics Hot Spots Program Risk Assessment Guidelines, Technical Support Document for the Derivation of Noncancer Reference Exposure Levels, June 2008. Available: https://oehha.ca.gov/media/downloads/crnr/noncancertsdfinal.pdf.
California Environmental Protection Agency, Office of Environmental Health Hazard Assessment, Air Toxics Hot Spots Program Risk Assessment Guidelines, Technical Support Document for Cancer Potency Factors: Methodologies for derivation, listing of available values, and adjustments to allow early life stage exposures, May 2009. Available: https://oehha.ca.gov/media/downloads/crnr/tsdcancerpotency.pdf.
California Environmental Protection Agency, Office of Environmental Health Hazard Assessment, Air Toxics Hot Spots Program, Risk Assessment Guidelines, Guidance Manual for Preparation of Health Risk Assessments, February 2015.
[4] U.S. Environmental Protection Agency, Office of Emergency and Remedial Response, Risk Assessment Guidance for Superfund, Volume I, Human Health Evaluation Manual (Part A), Interim Final, EPA/540/1-89/002, December 1989. Available: https://www.epa.gov/sites/production/files/2015-09/documents/rags_a.pdf.

ATMP-PC035-78

Comment: Second, the Human Health Risk Assessment Technical Report ("HRA Report"), provided as Appendix C.6 to the DEIR, provides the total emissions used in the dispersion analysis of construction sources (see excerpt below) (Appendix C.6, p. 3-2).

Table 3-1 On-Airport Construction TOG and PM_{10} Emissions for the Proposed Project

Averaging Period	PM_{10}				TOG			Comments
	Diesel Engine Exhaust	Gasoline Engine Exhaust	Fugitive Dust	Tire & Brake Wear	Diesel Engine Exhaust	Gasoline Engine Exhaust	Paving & Coating	
Peak Daily (lbs)	5.84	0.05	18.78	0.72	36.25	1.26	47.64	Used for Acute Non-Cancer Health Hazard
Peak Annual (tons)	0.53	0.01	1.88	0.07	3.24	0.13	4.33	Used for Chronic Non-Cancer Health Hazard
Average for 14-year Constructi on Period (tons/year)	0.21	<0.01	0.62	0.03	NA	0.05	1.08	Used for Cancer Risk

However, the HRA Report fails to provide the total emissions used in the dispersion analysis of operational sources. As a result, we cannot verify the DEIR's operational HRA, and the DEIR's less-than-significant impact conclusion should not be relied upon.

Response: Total emissions used in the dispersion analysis of operational sources are not summarized in Appendix C.6, Human Health Risk Assessment Technical Report, of the Draft EIR. This information is, however, contained in other appendices of the Draft EIR:

- Appendix C.2, Operational Emissions Calculations, contains the operational emission calculations.
- Appendix C.5, Human Health Risk Assessment Inputs, contains the operations particulate concentrations by source group for both with and without Project. This appendix also includes the aircraft fuel particulates, particulates, and organics toxic air contaminants (TAC) speciation profiles.
- Appendix C.8, Modeling Protocols, contains detailed descriptions of the emissions estimation methodologies.

Information from these Draft EIR appendices was used in the human health risk assessment calculations, and the incremental operational emission concentrations at the peak location are provided in Attachments 1.2 and 1.3 of Appendix C.6 of the Draft EIR. This information is also cited and summarized in the text of the Draft EIR (see Section 4.1.2 of the Draft EIR.)

ATMP-PC035-79

Comment: Third, in order to evaluate the Project's criteria air pollutant emissions, the DEIR compares the 2028 Project scenario with the 2018 baseline scenario, as well as the 2028 with Project scenario to the 2028 without Project scenario (p. 4.1.1-34). However, in order to evaluate the Project's TAC emissions, the DEIR compares the 2028 Project scenario with the 2018 baseline scenario, as well as the 2028 without Project scenario to the 2018 baseline scenario (see excerpt below) (p. 4.1.2-19, Table 4.1.2-4).

Table 4.1.2-4
Incremental Cancer Risks for Maximally Exposed Individuals for 2028 With Project Operations Compared to 2018 Baseline and 2028 Without Project Compared to 2018 Baseline

Receptor Type	Incremental Cancer Risks[1,2,3,4] (per million people)	
	2028 With Project Operations Compared to 2018 Baseline	2028 Without Project Operations Compared to 2018 Baseline
Off-Airport Worker, 25 years	5	-0.2
Adult Resident, 70 years	-4	-4
Adult Resident, 30 years	-4	-3
Child Resident, 9 years	-3	-2
School Child, 12 years	-1	-0.9

Source: Appendix C.6 of this EIR.

Notes:
1 It was assumed that for operations, receptors are exposed to operations-related TAC beginning in 2028 and continuing through the remainder of the receptors' exposure periods.
2 Maximally Exposed Individual (MEI) locations are shown on Figure 4.1.2-4.
3 The MEI value for the school child cancer risk is at a residential/commercial grid location and not at an existing school location. The highest estimated cancer risk for school children at an existing school is estimated to be -1 in 1 million at Cowan Avenue Elementary School (the school at grid point 176).
4 Negative values indicate a beneficial impact.

As demonstrated in the table above, the DEIR compares the 2028 Project scenario with the 2018 baseline scenario, as well as the 2028 without Project scenario to the 2018 baseline scenario, and ultimately concludes that Project operation would result in a negative cancer risk (i.e. a beneficial impact). Furthermore, the estimated 70-year adult

resident, 30-year adult resident, 9-year child resident, and 12-year school child cancer risks are negative regardless of whether or not the Project is approved. Given that the majority of estimated cancer risks are negative with or without the proposed Project, the use of the 2018 baseline scenario may be misleading. According to the Association of Environmental Professionals ("AEP") CEQA Portal Topic Paper on "Baseline and Environmental Setting":

"For projects that may be implemented over a period of years, or even decades, simply comparing the effects of such a project to a baseline representing existing conditions may not provide a full and accurate picture of the project's impacts."[5]

As the proposed Project would be implemented over a period of 7 years, the DEIR should have compared the TAC emissions associated with the 2028 With Project Operations scenario to the 2028 Without Project Operations scenario, consistent with the DEIR's analysis of the Project's operational criteria air pollutant emissions. By failing to consider a baseline scenario that provides a full and accurate picture of the Project's impacts, the DEIR may underestimate the Project's operational health risk impacts and should not be relied upon.

[5] "Baseline and Environmental Setting." AEP, August, 2016, available at: https://ceqaportal.org/tp/Baseline%20and%20Environmental%20Setting%20Topic%20Paper%2008-23-16.pdf, p. 3.

Response: The baseline analysis was conducted pursuant to, and complies with, the requirements of CEQA. (State CEQA Guidelines Section 15125(a).) The operational emissions comparison using the standard CEQA approach (i.e., baseline as existing conditions at time of the Notice of Preparation [NOP]), is explained in Section 4.1.1.4.1.1 on page 4.1.1-34 of the Draft EIR. The results for the incremental cancer risks for maximally exposed individuals (MEI) during the With Project operational period compared to 2018 baseline conditions are shown in Table 4.1.2-3; this difference was used to determine the significance of Project-related emissions as related to incremental cancer risk in 2028 in accordance with the requirements of CEQA.

The results for incremental cancer risks for MEI for 2028 With Project operations compared to 2028 Without Project conditions are shown on Table 4.1.2-4 on page 4.1.2-19 of the Draft EIR. As stated in the text preceding the table, this comparison is provided for informational purposes only; it was not used as a basis for the significance determination.

The excerpt in the comment from the CEQA Portal Topic Paper on "Baseline and Environmental Setting" is taken out of context. The text surrounding this excerpt states that the use of a "future baseline" (which would be akin to comparing 2028 With Project to 2028 Without Project) is "unusual" and that comparison to an existing conditions baseline is still warranted. The paper notes that the Court's conclusion is that the exclusive use of a future baseline should apply only to situations where "justified by unusual aspects of the project or the surrounding conditions."[1] The paper provides guidance based on the California Supreme Court's decision in *Neighbors for Smart Rail v. Exposition Metro Line Construction Authority* (2013) 57 Cal.4th 439. In that case, the

Court held that an EIR should describe existing conditions at the time the analysis is performed, and that these existing conditions "normally" constitute the environmental baseline against which a project's impacts are measured. If, however, the agency determines that such an analysis would be misleading, an agency has discretion to "omit an analysis of the project's significant impacts on existing environmental conditions and substitute a baseline consisting of environmental conditions projected to exist in the future," provided the agency explains why "an existing conditions analysis would be misleading or without informational value." (See State CEQA Guidelines, Section 15125(a).)

In this instance, the Draft EIR's analysis is consistent with the Neighbors for Smart Rail decision and with State CEQA Guidelines Section 15125(a). The analysis of TAC emissions follows the normal approach by relying on a "baseline" condition that is consistent with environmental conditions at the time the environmental review process commenced.

In order to adopt the approach suggested by the commenter, it would have to be demonstrated that the use of an existing conditions baseline "would be misleading or without informational value." The commenter has not provided evidence addressing this issue. In this case, an existing conditions baseline is neither misleading nor without informational value. For this reason, LAWA has concluded that it is appropriate to adhere to the approach recommended by State CEQA Guidelines Section 15125(a).

In addition, the CEQA Portal Topic Paper indicates that the comparison to a "future baseline" may be warranted for "projects that may be implemented over a period of years, or even decades." However, the proposed Project would be implemented over a period of 7 years, which is less than a decade and significantly less than the 20-year time frame that is used as an example in the CEQA Portal Topic Paper.

The air quality analysis results for operational emissions for 2028 With Project compared to 2028 Without Project, shown in Table 4.1.1-11 on pages 4.1.1-46 and 4.1.1-47 of the Draft EIR, were provided "to remove the influence of background growth and differences in motor vehicle emission factors between 2018 and, thereby, to highlight the air pollutant emissions impacts of the proposed Project compared to future emissions that are estimated to occur without the Project." The results of this analysis indicate that "[t]he combined effect of these changes in emission sources would result in an increase in all pollutant emissions (i.e., CO, VOC, NOX . . . PM10, and PM2.5)[2] under the 2028 With Project scenario as compared to the 2028 Without Project scenario. The increases in traffic from additional employee travel under the With Project scenario, as well as stationary source emissions from the new terminal operations account for the majority of the increased emissions. Although this analysis is presented for informational purposes only, as shown in Table 4.1.1 11, the incremental emissions from operation of the proposed Project compared to the 2028 Without Project scenario would exceed the SCAQMD significance threshold for VOC. This increase in VOC emissions would be associated primarily with emissions generated through the day-to-day operation of the new Terminal 9 and Concourse 0 facilities." Although the human health impact of this future baseline comparison is not calculated in terms of incremental cancer risk, the exceedance of the SCAQMD significance threshold for VOC, which is a TAC, is clearly stated in the Draft EIR.

As stated in the comment, the Draft EIR text on p. 4.1.2-19 is clear on what is represented in Table 4.1.2 4 and is not misleading. The table provides the 2028 Project Operations compared to 2018 Baseline, as well as the 2028 Without Project Operations compared to 2018 Baseline.

[1] Association of Environmental Professionals. CEQA Portal Topic Paper: Baseline and Environmental Setting, August 23, 2016. Available: https://ceqaportal.org/tp/Baseline%20and%20Environmental%20Setting%20Topic%20Paper%2008-23-16.pdf.
[2] The text on page 4.1.1-47 of the Draft EIR incorrectly stated that the conclusions presented in Table 4.1.1-11 show an increase in SOx under the 2028 With Project scenario as compared to the 2028 Without Project scenario. As shown in Table 4.1.1-11 of the Draft EIR, the operational emissions of SOx would decrease in this comparison. This typographical on page 4.1.1-47 has been corrected. Please see Chapter F3, Corrections and Clarifications to the Draft EIR.

ATMP-PC035-80

Comment: Failure to Consider Long-Term Impacts

The DEIR fails to consider the full extent of the Project's operational air quality impacts by failing to analyze long-term conditions. The buildout year analyzed in the DEIR's air quality analysis is 2028 (see excerpt below) (p. 4.1.2-19, Table 4.1.2-4).

Table 4.1.2-4

Table 4.1.2-4
Incremental Cancer Risks for Maximally Exposed Individuals for 2028 With Project Operations Compared to 2018 Baseline and 2028 Without Project Compared to 2018 Baseline

Receptor Type	Incremental Cancer Risks[1,2,3,4] (per million people)	
	2028 With Project Operations Compared to 2018 Baseline	2028 Without Project Operations Compared to 2018 Baseline
Off-Airport Worker, 25 years	5	-0.2
Adult Resident, 70 years	-4	-4
Adult Resident, 30 years	-4	-3
Child Resident, 9 years	-3	-2
School Child, 12 years	-1	-0.9

Source: **Appendix C.6** of this EIR.

Notes:
1 It was assumed that for operations, receptors are exposed to operations-related TAC beginning in 2028 and continuing through the remainder of the receptors' exposure periods.
2 Maximally Exposed Individual (MEI) locations are shown on Figure 4.1.2-4.
3 The MEI value for the school child cancer risk is at a residential/commercial grid location and not at an existing school location. The highest estimated cancer risk for school children at an existing school is estimated to be -1 in 1 million at Cowan Avenue Elementary School (the school at grid point 176).
4 Negative values indicate a beneficial impact.

However, as demonstrated in the Activity Forecasts and Operational Analyses, provided as Appendix B to the DEIR, the Project is expected to generate an additional 165,316 annual aircraft operations in 2045, when compared to 2028 (see excerpt below) (p. 3-12, Table 3-7).

TABLE 3-7 HISTORICAL AND UNCONSTRAINED FORECAST TOTAL UNSCHEDULED OPERATIONS

FISCAL YEAR[1]	AIRCRAFT OPERATIONS		SHARE
	UNSCHEDULED[2]	TOTAL[3]	UNSCHEDULED[4]
Unconstrained Forecast[5]			
2018	71,454	714,543	10.0%
2023	75,190	751,901	10.0%
2028	79,984	799,843	10.0%
2033	85,347	853,471	10.0%
2038	90,240	902,401	10.0%
2043	94,735	947,345	10.0%
2045	96,516	965,159	10.0%

Thus, the DEIR's Activity Forecasts and Operational Analyses indicates a significant amount of planned growth, which was not accounted for in the DEIR's air quality analysis. By failing to analyze the Project's long-term operational air quality impacts, the DEIR fails to consider the full extent of the Project's operational air quality impacts and should not be relied upon.

Response: Please see Topical Response TR-ATMP-G-3 regarding the reasons why 2028 is the appropriate horizon year for evaluating the impacts of the proposed Project. With respect to the commenter's assertions that the proposed Project would generate additional aircraft operations in 2045, please see Section 2.3.1.2.2 of the Draft EIR. As explained there, the annual activity forecast and regression analysis prepared by LAWA's aviation experts determined that aircraft operations would be the same in 2028 with or without the proposed Project, and that the proposed Project would not result in increased aviation and/or passenger activity levels or capacity at LAX. This analysis is supported by substantial evidence as documented in Appendix B.1 of the Draft EIR. Please see Topical Response TR-ATMP-G-1 for further discussion of the validity of this forecast. For all of these reasons, the Draft EIR's analysis of operational air quality impacts is accurate and appropriate.

ATMP-PC035-81

Comment: Greenhouse Gas

Failure to Adequately Evaluate Greenhouse Gas Impacts
The DEIR estimates that the Project would generate net annual GHG emissions of 204,877 metric tons of carbon dioxide equivalents per year ("MT CO2e/year"), or an increase of 9.5% from baseline conditions, which indicates a significant GHG impact (see excerpt below) (p. 4.4-29, Table 4.4-5).

Table 4.4-5
Construction (Amortized) and Operational GHG Emissions for the Proposed Project as Compared to 2018 Baseline Conditions

Emission Source	Baseline Conditions (2018)		Proposed Project (2028)		Incremental Difference	
	MT/Yr CO_2e	Percent of Total	MT/Yr CO_2e	Percent of Total	MT/Yr CO_2e	Percent Change
Aircraft	930,589	43	1,142,950	48	212,362	22.8
APUs	45,135	2	48,941	2	3,806	8.4
GSE	27,723	1	19,626	1	(8,098)	(29.2)
Stationary	97,397	5	107,490	5	10,093	10.4
Autos	1,020,793	47	1,005,382	43	(15,410)	(1.5)
Parking	30,186	1	28,742	1	(1,444)	(4.8)
Construction[1]	--	--	3,568	<1	3,568	100
TOTALS[2]	2,151,823	100	2,356,700	100	204,877	9.5

As a result, the DEIR includes MM-AQ/GHG (ATMP)-1 through MM-AQ/GHG (ATMP)-6 and MM-GHG (ATMP)-1 through MM-GHG (ATMP)-5 (p. 4.4-31 - 4.4-32). However, after the implementation of these mitigation measures, the DEIR concludes that the Project's GHG emissions would be significant and unavoidable, stating:

"The proposed Project would generate GHG emissions directly and indirectly that would have a significant impact on the environment. Mitigation Measures MM-AQ/GHG (ATMP)-1 through MM-AQ/GHG (ATMP)-6, MM-GHG (ATMP)-1 through MM-GHG (ATMP)-5, and MM-T (ATMP)-1 would reduce GHG emissions associated with construction and operation of the proposed Project. However, the vast majority of GHG emissions associated with operation of the proposed Project in 2028 would occur with or without Project implementation and are from aircraft, which LAWA does not own and has no authority to control (i.e., Scope 3 GHG emissions). As described in Section 4.1.1, Air Quality, the USEPA establishes the overall policies and regulations for protecting air quality nationwide, which include setting standards for stationary (e.g., power plants, industrial boilers, incinerators) and mobile (e.g., motor vehicles, off/non-road vehicles, aircraft engines) sources of pollutant emissions, including GHG emissions. Section 233 of the federal Clean Air Act exclusively vests the authority to promulgate emission standards for aircraft and aircraft engines with the USEPA; states and other municipalities are preempted from adopting or enforcing any standard with respect to aircraft engine emissions unless such standard is identical to the USEPA's standards. Implementation of the proposed mitigation measures would reduce Project-related GHG emissions, but not to a level that would be less than significant. No other feasible mitigation measures have been identified that would further reduce GHG impacts. Therefore, impacts associated with Project-related GHG emissions would remain significant and unavoidable" (p. 4.4-33 - 4.4-34).

Furthermore, the DEIR evaluates the Project's consistency with Executive Orders S-3-05, B-30-15, and B-55-18; CARB's 2017 Climate Change Scoping Plan and the City of Los Angeles' Sustainable City
pLAn/Green New Deal (p. 4.4-38). However, based on numerous conflicts with these plans, the DEIR concludes that the Project's GHG impact would be significant and unavoidable, stating:

"Implementation of Mitigation Measures MM-AQ/GHG (ATMP)-1 through MM-AQ/GHG (ATMP)-6, MM-GHG (ATMP)-1 through MM-GHG (ATMP)-5, and MM-T (ATMP)-1, presented above in the discussion of Impact 4.4-1, would reduce GHG emissions

associated with construction and operation of the proposed Project. However, as noted in that discussion, even with implementation of these mitigation measure, Project-related GHG emissions would be significant and unavoidable. The reduction in emissions resulting from Mitigation Measures MM-AQ/GHG (ATMP)-1 through MM-AQ/GHG (ATMP)-6, MM-GHG (ATMP)-1 through MM-GHG (ATMP)-5, and MM-T (ATMP)-1 would reduce the severity of Project-related conflicts with certain applicable plans, policies, and regulations adopted for the purpose of reducing emissions of GHG, but would not eliminate these conflicts. Therefore, impacts of the proposed Project with respect to applicable plans, policies, and regulations adopted for the purpose of reducing the emissions of GHGs would remain significant and unavoidable" (p. 4.4-38).

However, the DEIR's analysis of the Project's GHG impact, as well as the subsequent significant-and-unavoidable GHG impact conclusion, is incorrect for three reasons.

(1)The DEIR's quantitative GHG analysis relies upon an unsubstantiated analysis of emissions;
(2)The DEIR fails to implement all feasible mitigation to reduce the Project's GHG emissions; and
(3)The DEIR fails to consider the performance-based standards under CARB's 2017 Scoping Plan.

Response: This comment introduces the issues raised by the commenter in comments ATMP-PC035-82 through ATMP-PC035-84. Responses to the issues raised in these comments are provided in Responses to Comments ATMP-PC035-74 and ATMP-AL010-172 (which respond to comment ATMP-PC035-82); ATMP-PC035-83, which includes a reference to Topical Response TR-ATMP-AQ/GHG-1; and ATMP-PC035-32 (which responds to comment ATMP-PC035-84). Please see Responses to Comments ATMP-PC035-74, ATMP-AL010-172, ATMP-PC035-83, Topical Response TR-ATMP-AQ/GHG-1, and ATMP-PC035-32.

ATMP-PC035-82

Comment: (1) Incorrect and Unsubstantiated Quantitative GHG Analysis
As discussed above, the DEIR estimates that the Project would generate net annual GHG emissions of 204,877 MT CO2e/year (p. 4.4-29, Table 4.4-5). However, the DEIR's quantitative GHG analysis should not be relied upon, as it relies upon an unsubstantiated analysis of the Project's emissions. As previously discussed, when we reviewed the DEIR's analysis of the Project's emissions, provided in the AQ & GHG Report as Appendix C to the DEIR, we found several inadequacies, as well as inconsistencies with the information disclosed in the DEIR and associated documents. As a result, the DEIR's quantitative GHG analysis may underestimate the Project's GHG emissions and should not be relied upon to determine Project significance. An updated EIR should be prepared that adequately assesses the potential GHG impacts that construction and operation of the proposed Project may have on the surrounding environment.

Response: Please see Responses to Comments ATMP-PC035-74 and ATMP-AL010-172 regarding the adequacy of the GHG emissions analysis with respect to the issues raised by the

commenter. As discussed in those responses, construction emissions from hauling and vendor trucks and operational emissions from water usage and solid waste disposal were included in the emissions calculations. It should also be noted that Section 4.4 of the Draft EIR found the unmitigated, Project-related GHG emissions would result in a significant impact, and the mitigated emissions were found to be significant and unavoidable.

ATMP-PC035-83

Comment: (2) Failure to Implement All Feasible Mitigation to Reduce GHG Emissions
As discussed above, the DEIR's GHG analysis relies upon a flawed analysis of the Project's emissions. However, despite the DEIR's flawed air model, the DEIR's GHG emissions estimates indicate a significant GHG impact. As a result, the DEIR concludes that the proposed Project's GHG emissions would be significant and unavoidable (p. 4.4-33 - 4.4-34). However, while we agree that the Project's GHG emissions would be significant, the DEIR's conclusion that these impacts are "significant and unavoidable" is incorrect. According to CEQA Guidelines § 15096(g)(2):

"When an EIR has been prepared for a project, the Responsible Agency shall not approve the project as proposed if the agency finds any feasible alternative or feasible mitigation measures within its powers that would substantially lessen or avoid any significant effect the project would have on the environment."

As you can see, an impact can only be labeled as significant and unavoidable after all available, feasible mitigation is considered. However, while the DEIR implements Mitigation Measures MM-AQ/GHG (ATMP)-1 through MM-AQ/GHG (ATMP)-6, MM-GHG (ATMP)-1 through MM-GHG (ATMP)-5, and MM-T (ATMP)-1, the DEIR fails to implement all feasible mitigation (p. 4.4-31- 4.4-33). Therefore, the DEIR's conclusion that the Project's GHG impact is significant and unavoidable is unsubstantiated. To reduce the Project's GHG emissions to the maximum extent possible, additional feasible mitigation measures should be incorporated, such as those suggested in the section of this letter titled "Feasible Mitigation Measures Available to Reduce Emissions."[6] Thus, the Project should not be approved until an updated EIR is prepared, including updated, accurate air modeling, as well as incorporating all feasible mitigation to reduce emissions to less-than-significant levels.

[6] See section titled "Feasible Mitigation Measures Available to Reduce Emissions" on p. 12 of this comment letter. These measures would effectively reduce the Project's GHG emissions.

Response: This comment refers to the mitigation measures identified in comments ATMP-PC035-86 through ATMP-PC035-97, which are each addressed in Topical Response TR-ATMP-AQ/GHG-1. Please see Topical Response TR-ATMP-AQ/GHG-1 regarding the feasibility of the mitigation measures identified in comments ATMP-PC035-86 through ATMP-PC035-97. As discussed on page 4.4-33 in Section 4.4 and Appendix C.9 of the Draft EIR, LAWA reviewed over 90 possible mitigation measures to determine if they were already being implemented at LAX, were proposed to be included in the proposed Project as a

design/operation feature or as a Project mitigation measure, or were considered to be not applicable to, or infeasible for, the proposed Project. Contrary to the commenter's statement, the Draft EIR does not exclude any mitigation measures that could feasibly be implemented to address significant GHG impacts.

ATMP-PC035-84

Comment: (3) Failure to Consider Performance-Based Standards Under CARB's 2017 Scoping Plan

As previously mentioned, the Project relies upon the Project's consistency with CARB's 2017 Scoping Plan in order to determine Project significance. However, review of the Project documents demonstrates that the DEIR fails to consider the performance-based standards under the CARB's 2017 Scoping Plan.

i. Passenger & Light Duty VMT Per Capita Benchmarks per SB 375
In reaching the State's long-term GHG emission reduction goals, CARB's 2017 Scoping Plan explicitly cites to SB 375 and the VMT reductions anticipated under the implementation of Sustainable Community Strategies.[7] CARB has identified the population and daily VMT from passenger autos and light-duty vehicles at the state and county level for each year between 2010 to 2050 under a "baseline scenario" that includes "current projections of VMT included in the existing Regional Transportation Plans/Sustainable Communities Strategies (RTP/SCSs) adopted by the State's 18 Metropolitan Planning Organizations (MPOs) pursuant to SB 375 as of 2015."[8] By dividing the projected daily VMT by the population, we calculated the daily VMT per capita at the county level for 2030 (target year under SB 32) (see table below and Attachment A).

2017 Scoping Plan Daily VMT Per Capita			
Los Angeles County			
Year	Population	LDV VMT Baseline	VMT Per Capita
2030	10,868,614	215,539,586	19.83

The DEIR implements MM-T (ATMP)-1, which requires the implementation of a VMT reduction program resulting in a 20.4 VMT per employee value (p. 4.8-56). The below table compares the 2017 Scoping Plan daily VMT per capita value against the DEIR's daily VMT per capita value (see table below and Attachment A).

Daily VMT Per Capita from Passenger & Light-Duty Trucks, Exceedances under 2017 Scoping Plan Performance-Based SB 375 Benchmarks	
Sources	DEIR Modeling
Daily VMT Per Capita	20.40
2017 Scoping Plan Benchmarks, Los Angeles County Specific	
19.83 VMT (2030 Projected) Exceed?	Yes

As shown above, t he DEIR's daily VMT per capita exceeds the CARB 2017 Scoping Plan projection for Los Angeles County for 2030. Because the exceeds the CARB 2017 Scoping Plan performance-based daily VMT per capita projection, the Project conflicts with the CARB 2017 Scoping Plan. As such, a Project specific EIR should be prepared for the proposed Project to provide additional information and analysis evaluating the Project's consistency with CARB's 2017 Scoping Plan.

[7] "California's 2017 Climate Change Scoping Plan." CARB, November 2017, available at: https://ww3.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf, p. 25, 98, 101-103.
[8] "Supporting Calculations for 2017 Scoping Plan-Identified VMT Reductions," Excel Sheet "Readme." CARB, January 2019, available at: https://ww2.arb.ca.gov/sites/default/files/2019-1/sp_mss_vmt_calculations_jan19_0.xlsx.

Response: Although the population and VMT data cited in this comment is listed in the supporting documentation in the 2017 Scoping Plan, it represents a countywide VMT per capita metric that would include all travel within Los Angeles County. In preparing the supporting documentation, CARB specifically states that the data is "non-binding technical information that acts as an optional aide to local governments…"[1] and, therefore, this data should not be used as mandatory targets for the proposed Project.

Furthermore, while this comment correctly cites Section 4.8 of the Draft EIR, it is comparing the VMT per LAX employee (20.4) to the VMT for the entire population of Los Angeles County (19.83). Therefore, while the employment metric is higher than the countywide VMT per capita, it is not an apples-to-apples comparison. Rather, as discussed on page 4.8-62 of the Draft EIR, "the cumulative passenger levels associated with terminal improvement projects would not conflict with the forecast in the 2020-2045 RTP/SCS; no significant cumulative impact would occur." Because the 2020-2045 RTP/SCS was prepared in response to SB 375 and contains associated VMT and emission reduction goals, but complying with the 2020-2045 RTP/SCS, the proposed Project is subsequently also complying with the VMT reduction goals established by the 2017 Scoping Plan. Be that as it may, as shown on Table 4.4-7 on page 4.4-35 of the Draft EIR, the proposed Project was not found to be consistent with the 2017 Scoping Plan because the Project's increase in GHG emissions compared to existing conditions could hinder the State's ability to achieve statewide GHG emission reduction goals. As such, Section 4.4.5.2 of the Draft EIR states that these GHG impacts would be significant.

The commenter states that "a Project specific EIR should be prepared for the proposed Project to provide additional information and analysis evaluating the Project's consistency with CARB's 2017 Scoping Plan." The LAX Airfield and Terminal Modernization Project EIR is a project-specific EIR. The EIR includes information concerning the proposed Project's consistency with CARB's 2017 Scoping Plan. Please see Draft EIR pages 4.4-35 and 4.4-38. Additional information concerning the Project's consistency with CARB's 2017 Scoping Plan is provided in the Final EIR. (See, for example, Response to Comment ATMP-PC035-32.)

[1] California Air Resources Board, CARB 2017 Scoping Plan-Identified VMT Reductions and Relationship to State Climate Goals, page 1, January 2019. Available: https://ww2.arb.ca.gov/resources/documents/carb-2017-scoping-plan-identified-vmt-reductions-and-relationship-state-climate.

ATMP-PC035-85

Comment: (4) Failure to Consider Performance-based Standards under SCAG's RTP/SCS
The DEIR fails to consider the Project's consistency with SCAG's 2020-2045 RTP/SCS in order to determine the significance of the Project's GHG impact. Specifically, review of the Project documents demonstrates that the DEIR fails to consider the performance-based standards under SCAG's 2020-2045 RTP/SCS, such as daily vehicle miles traveled ("VMT") per capita benchmarks.

i. SB 375 RTP/SCS Daily VMT Per Capita Target

Under the SCAG's 2020 RTP/SCS, daily VMT per capita in Los Angeles County should decrease to 19.2 VMT by 2045.[9] Here, however, the DEIR fails to consider any of the abovementioned performance-based VMT targets.

As previously stated, the DEIR implements MM-T (ATMP}-1, which requires the implementation of a VMT reduction program resulting in a 20.4 VMT per employee value (p. 4.8-56). The below table compares the SCAG's 2020 RTP/SCS daily VMT per capita value for 2045 against the DEIR's daily VMT per capita value (see table below and Attachment A).

Daily VMT Per Capita from Passenger & Light-Duty Trucks, Exceedances under RTP/SCS Performance-Based SB 375 Target	
DEIR Modeling	
Daily VMT Per Capita	20.40
2020 RTP/SCS Benchmark, Los Angeles County	
19.2 VMT (2045 Target) Exceed?	Yes

As shown in the above table, the DEIR's daily VMT per capita value of 20.40 exceeds the Los Angeles County-specific target for 2045 under SCAG's 2020-2045 RTP/SCS. Thus, based on the DEIR's estimate, the Project would exceed the 2045 target VMT per capita value for Los Angeles County, indicating t hat the Project conflicts with the SCAG's RTP/SCS and SB 375.

[9] "Connect SoCal." SCAG, September 2020, available at: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176, pp. 138.

Response: The content of this comment is similar to comment ATMP-PC035-32; please see Response to Comment ATMP-PC035-32. Please also see Response to Comment ATMP-PC035-84 for additional information on the VMT targets.

ATMP-PC035-86

Comment: Feasible Mitigation Measures Available to Reduce Emissions

As previously described, the Project may result in potentially significant air quality, health risk, and GHG impacts that should be mitigated further. In an effort to reduce the Project's emissions, we identified several mitigation measures that are applicable to the proposed Project.

First, feasible mitigation measures can be found in the September 2019 Recirculated Draft Environmental Impact Report for the San Diego International Airport's Airport Development Plan.[10] Therefore, to reduce the Project's emissions, consideration of the following measures should be made:

- Ground Support Equipment Conversion:
  - o Transition all baggage tugs, belt loaders, lifts, pushback tractors, and utility carts at SDIA that are owned and operated by airlines and their ground handling contractors to service aircraft, shall be transitioned to alternative fuels (i.e., electric, natural gas, renewable diesel, biodiesel).

[10] "Recirculated Draft EIR for the Airport Development Plan." San Diego International Airport, September 2019, available at: https://files.ceqanet.opr.ca.gov/139992-3/attachment/Qtt7xI7P481vzOyukUOROq593qavIrooz53GfKek3lFply_keeUYEp6nyhlsQfRUlXqzJ7Td9R8gU_Xw0, p. 36-37, Table ES-3.

Response: Please see Topical Response TR-ATMP-AQ/GHG-1 regarding the evaluation of mitigation measures suggested here, and by additional commenters, to address significant air quality and/or GHG impacts. As set forth in Topical Response TR-ATMP-AQ/GHG-1, LAWA does not own or operate baggage tugs, belt loaders, lifts, pushback tractors, or other similar ground support equipment (GSE) at LAX. LAWA has adopted policies requiring airlines and GSE operators to reduce emissions from GSE. LAWA has also adopted an incentive program to accelerate the transition to zero-emission GSE equipment. LAWA will continue to implement these policies and programs. These policies and programs would apply to GSE used in connection with the proposed Project.

ATMP-PC035-87

Comment:
- Renewable Electricity:
  - o Power project-related buildings with 100 percent renewable electricity.

Response: Please see Topical Response TR-ATMP-AQ/GHG-1 regarding the evaluation of mitigation measures suggested here, and by additional commenters, to address significant air quality and/or GHG impacts. Topical Response TR-ATMP-AQ/GHG-1 addresses the commenter's proposal.

ATMP-PC035-88

Comment: • Clean Vehicle Parking:
o Designate 10 percent of new parking stalls for a combination of low-emitting, fuel-efficient, and carpool/vanpool vehicle.

Response: Please see Topical Response TR-ATMP-AQ/GHG-1 regarding the evaluation of mitigation measures suggested here, and by additional commenters, to address significant air quality and/or GHG impacts. Topical Response TR-ATMP-AQ/GHG-1 addresses the commenter's proposal.

ATMP-PC035-89

Comment: • Electric Vehicle Chargers:
o Install electric vehicle charging ports at three percent of new parking stalls and another three percent would be "EVSE-ready."

Response: Please see Topical Response TR-ATMP-AQ/GHG-1 regarding the evaluation of mitigation measures suggested here, and by additional commenters, to address significant air quality and/or GHG impacts. Topical Response TR-ATMP-AQ/GHG-1 addresses the commenter's proposal.

ATMP-PC035-90

Comment: • Ground Transportation Clean Vehicle Program:
o Implement a Commercial Ground Transportation Clean Vehicle Program.

Response: Please see Topical Response TR-ATMP-AQ/GHG-1 regarding the evaluation of mitigation measures suggested here, and by additional commenters, to address significant air quality and/or GHG impacts. Topical Response TR-ATMP-AQ/GHG-1 addresses the commenter's proposal. As explained in this topical response, LAWA is implementing such a program, and this program would apply to the proposed Project.

ATMP-PC035-91

Comment: • Bicycle Facilities:
o Install shower stalls and lockers, as well as covered bicycle storage for employees.

Response: Please see Topical Response TR-ATMP-AQ/GHG-1 regarding the evaluation of mitigation measures suggested here, and by additional commenters, to address significant air quality and/or GHG impacts.

ATMP-PC035-92

Comment: • Employee Parking Cash-Out Program:
o Implement a parking cash-out program for employees.

Response: Please see Topical Response TR-ATMP-AQ/GHG-1 regarding the evaluation of mitigation measures suggested here, and by additional commenters, to address significant air quality and/or GHG impacts. Topical Response TR-ATMP-AQ/GHG-1 addresses the commenter's proposal. As explained in this topical response, LAWA is implementing a program with numerous incentives to encourage the use of public transit by employees. This program would apply to the proposed Project.

ATMP-PC035-93

Comment: Second, feasible mitigation measures can be found in the February 2021 Nevada County Planning Commission Staff Report for the amendment to expand the existing Truckee Tahoe Airport District Administration Building and off-street parking area.[11] Therefore, to reduce the Project's emissions, consideration of the following measures should be made:

• Diesel engines, whether for off-road or on-road equipment, shall not be left idling for more than two minutes, at any location, except as provided in exceptions to the applicable state regulations regarding idling for off-road and on-road equipment (e.g., traffic conditions, safe operating conditions).

[11] "NEVADA COUNTY PLANNING COMMISSION STAFF REPORT." County of Nevada, February 2021, available at: https://www.mynevadacounty.com/DocumentCenter/View/37474/Truckee-Tahoe-Airport-Staff-Report-PLN20-0130--AAP20-0006-EIS20-0008PDF, p. 28-29.

Response: Please see Topical Response TR-ATMP-AQ/GHG-1 regarding the evaluation of mitigation measures suggested here, and by additional commenters, to address significant air quality and/or GHG impacts.

ATMP-PC035-94

Comment: • Instruct construction workers and equipment operators on the maintenance and tuning of construction equipment and require that such workers and operators properly maintain and tune equipment in accordance with manufacturer specifications.

Response: Please see Topical Response TR-ATMP-AQ/GHG-1 regarding the evaluation of mitigation measures suggested here, and by additional commenters, to address significant air quality and/or GHG impacts.

ATMP-PC035-95

Comment: Before starting onsite ground disturbance, demolition, or construction activities, submit a Construction Emissions Minimization Plan for review and approval. The plan shall include estimates of the construction timeline, with a description of each piece of off-road equipment required. The description may include, but is not limited to, equipment type, equipment manufacturer, engine model year, engine certification (Tier rating), horsepower, and expected fuel usage and hours of operation. For off-road equipment using alternative fuels, the description shall also specify the type of alternative fuel being used. Make the Construction Emissions Minimization Plan available to the public for review onsite during working hours. Post at the construction site a legible and visible sign summarizing the plan. State that the public may ask to inspect the plan for the project at any time during working hours and shall explain how to request to inspect the plan. Post at least one copy of the sign in a visible location on each side of the construction site facing a public right-of-way.

Response: Please see Topical Response TR-ATMP-AQ/GHG-1 regarding the evaluation of mitigation measures suggested here, and by additional commenters, to address significant air quality and/or GHG impacts.

ATMP-PC035-96

Comment: Develop and implement a phased carbon management program that is consistent with the standards of ACI "Level 3+" Airport Carbon Accreditation Program, or equivalent, including calculation of annual carbon emissions from airport activity, identifying emissions reduction targets, tracking progress toward achieving effective carbon management procedures, and publishing an annual biennial carbon footprint report as a component of the Airport's broader environmental sustainability program.

Response: Please see Topical Response TR-ATMP-AQ/GHG-1 regarding the evaluation of mitigation measures suggested here, and by additional commenters, to address significant air quality and/or GHG impacts.

ATMP-PC035-97

Comment: Finally, feasible mitigation measures can be found in CAPCOA's Quantifying Greenhouse Gas Mitigation Measures.[12] Therefore, to reduce the Project's emissions, consideration of the following measures should be made:

CAPCOA's Quantifying Greenhouse Gas Mitigation Measures
Measures – Energy
Building Energy Use
Obtain Third-party HVAC Commissioning and Verification of Energy Savings
Lighting
Install Higher Efficacy Public Street and Area Lighting

Limit Outdoor Lighting Requirements
Alternative Energy Generation
Establish Onsite Renewable or Carbon-Neutral Energy Systems
Establish Onsite Renewable Energy System – Solar Power
Utilize a Combined Heat and Power System
Measures – Transportation
Land Use/Location
Increase Destination Accessibility
Increase Transit Accessibility
Orient Project Toward Non-Auto Corridor
Locate Project near Bike Path/Bike Lane
Neighborhood/Site Enhancements
Provide Pedestrian Network Improvements, such as:
- Compact, mixed-use communities
- Interconnected street network
- Narrower roadways and shorter block lengths
- Sidewalks
- Accessibility to transit and transit shelters
- Traffic calming measures and street trees
- Parks and public spaces
- Minimize pedestrian barriers

Provide Traffic Calming Measures, such as:
- Marked crosswalks
- Count-down signal timers
- Curb extensions
- Speed tables
- Raised crosswalks
- Raised intersections
- Median islands
- Tight corner radii
- Roundabouts or mini-circles
- On-street parking
- Planter strips with trees
- Chicanes/chokers

Incorporate Bike Lane Street Design (on-site)
Provide Bike Parking in Non-Residential Projects
Provide Electric Vehicle Parking
Commute Trip Reduction Programs
Implement Commute Trip Reduction (CTR) Program – Voluntary
- Carpooling encouragement
- Ride-matching assistance
- Preferential carpool parking
- Flexible work schedules for carpools
- Half time transportation coordinator
- Vanpool assistance
- Bicycle end-trip facilities (parking, showers and lockers)
- New employee orientation of trip reduction and alternative mode options
- Event promotions and publications

- Flexible work schedule for employees
- Transit subsidies
- Parking cash-out or priced parking
- Shuttles
- Emergency ride home

Implement Commute Trip Reduction (CTR) Program – Required Implementation/Monitoring

- Established performance standards (e.g. trip reduction requirements)
- Required implementation
- Regular monitoring and reporting

Implement Subsidized or Discounted Transit Program

Provide Ent of Trip Facilities, including:

- Showers
- Secure bicycle lockers
- Changing spaces

Implement Commute Trip Reduction Marketing, such as:

- New employee orientation of trip reduction and alternative mode options
- Event promotions
- Publications

Implement Preferential Parking Permit Program

Price Workplace Parking, such as:

- Explicitly charging for parking for its employees;
- Implementing above market rate pricing;
- Validating parking only for invited guests;
- Not providing employee parking and transportation allowances; and
- Educating employees about available alternatives.

Implement Employee Parking "Cash-Out"

Transit System Improvements

Transit System Improvements, including:

- Grade-separated right-of-way, including bus only lanes (for buses, emergency vehicles, and sometimes taxis), and other Transit Priority measures. Some systems use guideways which automatically steer the bus on portions of the route.
- Frequent, high-capacity service
- High-quality vehicles that are easy to board, quiet, clean, and comfortable to ride.
- Pre-paid fare collection to minimize boarding delays.
- Integrated fare systems, allowing free or discounted transfers between routes and modes.
- Convenient user information and marketing programs.
- High quality bus stations with Transit Oriented Development in nearby areas.
- Modal integration, with BRT service coordinated with walking and cycling facilities, taxi services, intercity bus, rail transit, and other transportation services.

Implement Transit Access Improvements, such as:

- Sidewalk/crosswalk safety enhancements
- Bus shelter improvements

Expand Transit Network

Increase Transit Service Frequency/Speed

Provide Bike Parking Near Transit

Provide Local Shuttles
Road Pricing/Management
Implement Area or Cordon Pricing
Improve Traffic Flow, such as:
• Signalization improvements to reduce delay;
• Incident management to increase response time to breakdowns and collisions;
• Intelligent Transportation Systems (ITS) to provide real-time information regarding road conditions and directions; and
• Speed management to reduce high free-flow speeds.
Required Project Contributions to Transportation Infrastructure Improvement Projects
Vehicles
Utilize Alternative Fueled Vehicles, such as:
• Biodiesel (B20)
• Liquefied Natural Gas (LNG)
• Compressed Natural Gas (CNG)
Measures – Water
Water Supply
Use Gray Water
Use Locally Sourced Water Supply
Water Use
Adopt a Water Conservation strategy
Design Water-Efficient Landscapes (see California Department of Water Resources Model Water Efficient Landscape Ordinance), such as:
• Planting vegetation with minimal water needs, such as native species;
• Choosing vegetation appropriate for the climate of the project site;
• Choosing complimentary plants with similar water needs or which can provide each other with shade and/or water.
Plant Native Trees and Vegetation
Measures – Vegetation
Vegetation
Urban Tree Planting
Create New Vegetated Open Space
Measures – Construction
Construction
Use Alternative Fuels for Construction Equipment
Urban Tree Planting
Use Electric and Hybrid Construction Equipment
Limit Construction Equipment Idling Beyond Regulation Requirements
Institute a Heavy-Duty Off-Road Vehicle Plan, including:
• Construction vehicle inventory tracking system;
• Requiring hour meters on equipment;
• Document the serial number, horsepower, manufacture age, fuel, etc. of all onsite equipment; and
• Daily logging of the operating hours of the equipment.
Implement a Construction Vehicle Inventory Tracking System
Measures – Miscellaneous
Miscellaneous

Establish a Carbon Sequestration Project, such as:

• Geologic sequestration or carbon capture and storage techniques, in which CO2 from point sources is captured and injected underground;

• Terrestrial sequestration in which ecosystems are established or preserved to serve as CO2 sinks;

• Novel techniques involving advanced chemical or biological pathways; or

• Technologies yet to be discovered.

Establish Off-Site Mitigation

Use Local and Sustainable Building Materials

Require Environmentally Responsible Purchasing, such as:

• Purchasing products with sustainable packaging;

• Purchasing post-consumer recycled copier paper, paper towels, and stationary;

• Purchasing and stocking communal kitchens with reusable dishes and utensils;

• Choosing sustainable cleaning supplies;

• Leasing equipment from manufacturers who will recycle the components at their end of life;

• Choosing ENERGY STAR appliances and Water Sense-certified water fixtures;

• Choosing electronic appliances with built in sleep-mode timers;

• Purchasing 'green power' (e.g. electricity generated from renewable or hydropower) from the utility; and

• Choosing locally-made and distributed products

[12] http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf

Response: Please see Topical Response TR-ATMP-AQ/GHG-1 regarding the evaluation of mitigation measures suggested here, and by additional commenters, to address significant air quality and/or GHG impacts.

ATMP-PC035-98

Comment: These measures offer a cost-effective, feasible way to incorporate lower-emitting design features into the proposed Project, which subsequently, reduce emissions released during Project construction and operation. An updated EIR should be prepared to include all feasible mitigation measures, as well as include an updated GHG analysis to ensure that the necessary mitigation measures are implemented to reduce emissions to below thresholds.

Response: This comment refers to the suggested mitigation measures in comment ATMP-PC035-97. Please see Topical Response TR-ATMP-AQ/GHG-1 regarding the evaluation of mitigation measures suggested in comment ATMP-PC035-97, and by additional commenters, to address significant air quality and/or GHG impacts. As noted in Topical Response TR-ATMP-AQ/GHG-1, the Draft EIR evaluated almost 100 potentially applicable measures for the reduction of air quality and GHG emissions across a broad range of mitigation types. This extensive evaluation resulted in the identification of 11 mitigation measures that would address air quality and/or GHG emissions. Several of the measures evaluated were not eligible to be considered as mitigation because they were

already being implemented at LAX under existing LAWA programs and requirements, and/or would already be incorporated into the proposed Project as Project features. Of the remaining measures, not every identified measure would result in directly attributable or quantifiable reductions for significant air quality or GHG impacts, nor would every analyzed measure result in effective mitigation of significant Project-related impacts, nor would every measure be effective, nor would every measure be feasible.

ATMP-PC035-99

Comment: The updated EIR should also demonstrate a commitment to the implementation of these measures prior to Project approval, to ensure that the Project's significant emissions are reduced to the maximum extent possible.

Response: This comment refers to the suggested mitigation measures in comment ATMP-PC035-97. Please see Topical Response TR-ATMP-AQ/GHG-1 regarding the evaluation of mitigation measures suggested in comment ATMP-PC035-97, and by additional commenters, to address significant air quality and/or GHG impacts. Further, the mitigation measures identified in the Draft EIR would be incorporated into the Mitigation Monitoring and Reporting Program (MMRP) and would be required to be implemented.

ATMP-PC036	**Alexander, David Kimball**	**None Specified**	**3/15/2021**

ATMP-PC036-1

Comment: There needs to be a supplemental EIR using findings from NES. Noise section of EIR still includes the reverse engineered, guaranteed a FONSI noise metric and standard of 65 dB DNL. We need real, unbiased, non-FAA and Airline Industry metrics to honestly access the environmental and health damages that will result from expanded air traffic from any LAX expansion. There is already way too much air traffic in LA. You should be restricting, not expanding.

Response: It is assumed that the term "NES" in the comment is a reference to the FAA's Neighborhood Environmental Survey. Please see Response to Comment ATMP-PC029-2 regarding the results of FAA's Neighborhood Environmental Survey. Relative to preparing a supplemental EIR using the findings of the NES, none of the criteria set forth in CEQA Section 21166 requiring preparation of a supplemental EIR have been met. Similarly, the findings of the NES are not "significant new information" requiring recirculation of the Draft EIR, because the findings of the NES do not change the analysis or significance conclusions in the EIR. (See State CEQA Guidelines Section 15088.5.) The commenter's reference to a FONSI (Finding of No Significant Impact) and 65 DNL (Day Night Level of noise) pertain to the environmental review under the National Environmental Policy Act (NEPA). The Draft EIR has been completed in accordance with the California Environmental Quality Act (CEQA). A separate environmental review of

the proposed Project under the requirements of NEPA is currently being prepared, and will be published later this year.

Section 4.7.1 of the Draft EIR provides a comprehensive evaluation of potential aircraft noise impacts associated with the proposed Project, based on accepted/approved methodologies, models, and thresholds of significance. It is important to note that implementation of the proposed Project would not result in more aircraft operations at LAX than would otherwise occur without the Project. With regard to future aircraft noise levels at LAX, as discussed on page 4.7.1-16 in Section 4.7.1.2 of the Draft EIR, the change in future (2028) aircraft noise conditions compared to existing baseline conditions is attributable to growth in passenger activity and aircraft operations that is anticipated to occur at LAX by 2028 with or without the proposed Project. In other words, the proposed Project itself would have no effect on noise levels associated with aircraft operations; rather, the change in noise levels from 2018 to 2028 aircraft operations will be entirely attributable to growth in aviation activity that will occur with or without the proposed Project. Please see Topical Response TR-ATMP-G-1 regarding the aviation demand forecast and future aviation activity at LAX.

Please also see Topical Response TR-ATMP-N-1 regarding health effects of noise and Topical Response TR-ATMP-N-2 regarding adequacy of the aircraft noise analysis and use of alternative metrics.

ATMP-PC037 Davis, Christina V. LAX Coastal Chamber of Commerce 3/14/2021

ATMP-PC037-1

Comment: The LAX Coastal Area Chamber has completed its review of the Draft Environmental Impact Report (DEIR) for the LAX Airfield and Terminal Modernization Project (ATMP). We find that the ATMP DEIR is in large measure a capable document that thoroughly apprises you of the potential impacts of the projects you are considering as required by CEQA and NEPA.

From a policy perspective, we are in support of the overall plan as set forth in the ATMP. We are pleased to see LAWA prioritize capital improvements for these critical landside projects which will improve traffic and access to the airport. We will submit our more detailed policy recommendation to the Board of Airport Commissioners separately from this document which contains our comments to the DEIR.

Response: The comment is noted and will be included in the Final EIR for consideration by the decision-makers prior to taking any action on the LAX Airfield and Terminal Modernization Project. Responses to the comments provided in this letter are provided in Responses to Comments ATMP-PC0037-2 through ATMP-PC0037-10 below.

ATMP-PC037-2

Comment: With respect to the DEIR, we would like to draw to your attention to the following:

Of particular interest to our membership are the sections of the DEIR addressing vehicular traffic accessing the Central Terminal Area (CTA). In addition to the information contained in the report, our members were able to receive additional briefing on this issue and conclude that the report's assessment of reduced Vehicle Miles Traveled (VMT) as well as the design features contained in the flyover access to the CTA provide a substantial benefit to the flow of traffic impacting our community overall and specifically its impacts the Westchester Business District. These changes appear to address, in a positive manner, the current difficulties found at the intersection of Sepulveda and Lincoln and provide miles of queuing space in the newly created access roads taking those vehicles off the already heavily burdened local arterials.

Response: The comment will be included in the Final EIR for consideration by the decision-makers prior to taking any action on the LAX Airfield and Terminal Modernization Project.

ATMP-PC037-3

Comment: Additionally, we notice a lack of information regarding any modeling of modes of transport for passengers in this DEIR. More specifically, modeling of the capacity of the Automated People Mover (APM) at peak times under the assumption that the APM will handle all rental car customers as well as parking facilities adjacent to the APM which may include both employees and passengers. Some questions that arise for this include: Will the APM be able to handle the projected volume of riders? Will there be more modeling to include passenger volume from other modes of transportation and will those models include employee and passenger access to the CTA? With private vehicles, Ubers, fly-way buses, parking/airport shuttles also serving as options are their projections for the percentage of people that these modes will service?

Response: The design, construction, and operation of the Automated People Mover (APM) system are part of the LAX Landside Access Modernization Program, which is separate from the proposed LAX Airfield and Terminal Modernization Project. Evaluation of the capacity of the APM is not a CEQA issue required for the Draft EIR. Notwithstanding, the EIR for the LAX Landside Access Modernization Program indicates that the APM system is being designed to accommodate approximately 5,800 people and luggage in each direction during peak hours. That design capacity is based on a nine-train system; however, the system can accommodate an additional train (i.e., a 10-train system) to increase capacity during peak periods.

With regards to the commenter's question of whether there will be more modeling to include passenger volume from other modes of transportation and will those models include employee and passenger access to the CTA, such information is already provided in the Draft EIR for the proposed Project. The transportation modeling completed for the Project includes passenger and employee volumes from other modes of transportation. The LAX travel demand model comprises 24 special generator zones,

including the CTA, various cargo facilities, passenger on-site airport structure parking, passenger off-site parking, employee parking, and airport administration buildings. Such information is described in Section 4.8.2.2 of the Draft EIR.

Similarly, with regards to the commenter's question of whether additional modeling will be completed to address private vehicles, Ubers, FlyAway buses, parking/airport shuttles, such information is already provided in Section 4.8.2.2, including Table 4.8-1, of the Draft EIR, with additional details provided in Appendix G of the Draft EIR.

ATMP-PC037-4

Comment: We also remain concerned about other impacts on the Westchester Business District that appear less than fully defined in the DEIR including issues relating to employee and traveler parking. Our members have long felt the impact of LAX employees using local retail and residential areas as convenient and "free" parking. Although many of those issues have been successfully resolved in cooperation with LAWA, the ATMP raises fresh questions about this issue including where the 1500 employee parking spaces for American Airlines set for removal from World Way are to be relocated.

Response: This comment regarding parking in the Westchester Business District is noted. The comment will be included in the Final EIR for consideration by the decision-makers prior to taking any action on the LAX Airfield and Terminal Modernization Project. The content of this comment is similar to comment ATMP-PC010-4; please refer to Response to Comment ATMP-PC010-4. LAWA agrees with the commenter that LAWA, in cooperation with local jurisdictions, has been able to address these problems when they have arisen in the past. LAWA anticipates that, in the event problems arise in the future, they will be similarly addressed. The comment regarding "the 1,500 employee parking spaces for American Airlines set for removal from World Way," there is no such parking near World Way. In the event the commenter meant to refer to the American Airlines parking lot near World Way West, there is no current proposal for removal of that parking lot.

ATMP-PC037-5

Comment: We also remain committed to support for alternative access to LAX other than by automobile and find insufficient information regarding encouraging pedestrian access in/out of the CTA and to the Westchester Business District.

Response: LAWA is also committed to supporting alternative access to LAX. Existing pedestrian access to the CTA is described on page 4.8-25 of the Draft EIR. Ground transportation improvements associated with the LAX Landside Access Modernization Program are currently under construction. These improvements will support and enhance alternative access to LAX, including, but not limited to, improvements that will connect with public transit facilities such as the Airport Metro Connector (AMC) station and the Metro Crenshaw/LAX light rail line, and improvements to bike paths and pedestrian walkways east of the airport that will enable users to access the CTA via the new automated people mover (APM) system. Specific to the LAX Airfield and Terminal Modernization Project,

the proposed elimination of the Sky Way exit from southbound Sepulveda Boulevard along with removal of the Sky Way/96th Street bridge over Sepulveda Boulevard will provide for a continuous sidewalk along the west side of Sepulveda Boulevard between the CTA and Lincoln Boulevard. LAWA, in coordination with Los Angeles Department of Transportation, will be installing a traffic camera system at the intersection of Lincoln Boulevard and Sepulveda Boulevard, which will help monitor the operation of that intersection so that signal timing can be modified if/when there is traffic congestion, which, in turn, can help facilitate pedestrian crossings during such periods and support the movement of pedestrians between the CTA and the Westchester Business District. Additionally, LAWA also has a very extensive transportation management program that supports LAWA employee's use of transit and other alternative modes of transportation. As indicated in Section 4.8 of the Draft EIR, numerous vehicle miles traveled (VMT) reduction strategies are proposed as mitigation for the LAX Airfield and Terminal Modernization Project, several of which support alternative modes of transportation for both passengers and employees of LAX.

ATMP-PC037-6

Comment: Likewise, it is unclear what impact the redesigned roadway will have on the operations at the Parking Spot located at Westchester and Sepulveda. We understand that a few such questions necessarily crossover from CEQA issues to operational decisions including questions relating to CTA access by rideshare services, hotel and parking shuttles.

Response: The roadway system improvements associated with the proposed Project would occur well south of the Parking Spot facility located at the corner of Westchester Boulevard and Sepulveda Boulevard, with the nearest improvement being the new flyover ramp from southbound Sepulveda Boulevard, which would start approximately 1,000 feet south of the Parking Spot facility. Regarding access to and from the Central Terminal Area (CTA) by rideshare services, hotel shuttles, and parking shuttles, the assignment of trips by vehicle type to either the CTA or to Landside Access Modernization Program facilities outside of the CTA are assumed in the transportation analysis for the proposed Project to be comparable to those assumed earlier for the Landside Access Modernization Program EIR. No changes in trip assignments are proposed as part of the LAX Airside and Terminal Modernization Project.

ATMP-PC037-7

Comment: As we have pointed out with all other LAWA projects we have reviewed, it remains crucial that construction staging and access must be designed to make extremely limited use of Westchester Parkway and shall only be used as truly necessary in order to reduce local impacts. This includes materials and truck deliveries as well as construction workers who should all be directed to follow a traffic plan down Imperial Highway to the western parts of the airport.

Response: As shown on Figure 2-29 in the Draft EIR, there are several potential construction staging areas located along Westchester Parkway, at which it would not be possible to avoid the use of Westchester Parkway during Project construction. LAWA has, however, long-implemented, and will continue to implement, measures to minimize construction traffic impacts associated with development projects at LAX, including along Westchester Parkway. Such measures include, but are not limited to, encouraging contractors to schedule shift start and end times to avoid peak morning and afternoon commute hours, scheduling truck hauls trips to also avoid those peak commute hours, and establishing truck haul routes that do not extend into or through residential areas.

ATMP-PC037-8

Comment: Our airline members are concerned about the loss of "space" that is currently used for which there is no apparent plan to replace. As identified on Table 2-4, the space concerns include:

1. Aircraft parking (T9 Site) (page 2-65)
2. LAWA operations aircraft parking (T9 Site) (page 2-66)
3. Impact on LAXFUEL current and future potential needs (page 2-63)
4. A portion of cargo staging space (Twy C Extension) (page 2-65)

Sufficient aircraft parking space has been a challenge at LAX for an extended period of time and the proposal to reduce space has the potential to limit future activity. As airlines plan their network flight schedules, particularly those who operate in either a hub-spoke structure and/or with slot/curfew restrictions, access to remain overnight (RON) or extended aircraft rest space can be a critical factor when deciding what flights may or may not be offered at a particular destination. As plans are further refined, the airline community strongly encourages LAWA to seriously consider alternate uses of space to preserve and create aircraft parking areas.

Response: The portion of this comment that addresses aircraft parking space is essentially the same as comment ATMP-PC019-2; please refer to Response to Comment ATMP-PC019-2. Please see Responses to Comments ATMP-PC020-1 and ATMP-PC020-2 regarding impacts to LAXFUEL's operations, and Response to Comment ATMP-PC037-10 regarding cargo staging space.

ATMP-PC037-9

Comment: Regarding space for LAXFUEL, the airline community would like to ensure that sufficient land, facilities, and other infrastructure is available for operations at time of construction as well as capacity for any forecasted future needs. Has there been an assessment of what needs might be associated with operations in future years?

Response: Please see Response to Comment ATMP-PC020-1 regarding space for LAXFUEL facilities. As noted in that response, LAWA will assess future fuel capacity needs at LAX as part of

its ongoing business practices and will work with LAXFUEL to ensure that sufficient facilities are available to meet future needs.

ATMP-PC037-10

Comment: There are furthermore concerns raised about cargo facility replacement issues which would have reduced environmental impacts if consolidated to the east side of the airport where trucking access would be more proximate to major highways. Furthermore, volume at many of the cargo areas exceeds capacity today. Further reduction in space would place limitations on how much cargo could be processed through the facility. Have alternatives been considered to retain an equivalent amount of space for cargo staging?

In particular, as LAX is aware, Mercury Air Cargo (a subsidiary of one of the Chamber's oldest member companies & longest non-airline tenant at LAX, Mercury Air Group) operates a warehouse on Avion Drive which is slated for demolition under the modernization plan. Mercury handles 11 foreign airlines at this location, all of which are vital to LA as a hub for international trade. The Chamber highlights the importance of LAX working with Mercury on options for its continued operation and service to these airlines elsewhere on the airport.

Response: As described in Section 2.5.1, particularly in Table 2-4, of the Draft EIR, existing cargo facilities, or portions thereof, that are displaced by development of proposed Project elements would be subject to on-site consolidation or relocation to other facilities at LAX. The commenter's suggestion to consolidate cargo operations to the east side of the airport where trucking access would be more proximate to major highways is so noted; however, the provision of a new consolidated cargo operations facility or area is outside the scope of the proposed Project.

The comments regarding Mercury Air Cargo are noted. On March 4, 2021, the Board of Airport Commissioners approved a two-year extension of Mercury Air Cargo's lease, which was previously due to expire on September 30, 2021. With the extension, the new expiration date is September 30, 2023, with two one-year extension options at LAWA's discretion. As noted in the Draft EIR, relocation of the Mercury operation following expiration of the lease would occur independently from the proposed Project and is not an enabling project with respect to the proposed Project. Any environmental evaluation of the relocation would be conducted as part of that action. Please see Response to Comment ATMP-AL010-12 for further discussion.

ATMP-PC037-11

Comment: The LAX Coastal Area Chamber of Commerce requests responses to the concerns raised herein and looks forward finding refinements to the overall plan to resolve such issues.

As a final note, we applaud LAWA and its planning team on how far it has come in designing this proposal from the ones first seen more than two decades ago. It was worth the wait.

Response: The comment is noted and will be included in the Final EIR for consideration by the decision-makers prior to taking any action on the LAX Airfield and Terminal Modernization Project. Responses to the concerns raised in this letter are provided in Responses to Comments ATMP-PC0037-1 through ATMP-PC0037-10 above.

ATMP-PC038	Acherman, Robert	Alliance for a Regional Solution to Airport Congestion	3/15/2021

ATMP-PC038-1

Comment: These comments to the Airfield and Terminal Modernization Project ("ATMP") Draft Environmental Impact Report (DEIR) are being provided on behalf our client, the Alliance for a Regional Solution to Airport Congestion ("ARSAC"). These comments are provided per ARSAC's right under the ARSAC-LAWA Memorandum of Understanding (hereinafter "MOU") which went into effect in September 2016. ARSAC's right to comment on Environmental Impact Reports ("EIRs") to help LAWA be more efficient in obtaining approval for projects extends to raising quality issues of the EIR where projects or project components do not comply with the National Environmental Quality Act ("NEPA"), the California Environmental Quality Act ("CEQA"), the 2006 Stipulated Settlement Agreement ("SSA"), the 2016 ARSAC-LAWA MOU and/or other laws, rules and regulations. The MOU provides the parameters for the ATMP and it appears the LAWA has disregarded the MOU in preparing the ATMP DEIR.

ARSAC has several issues with the ATMP DEIR:

1. Failure to comply with MOU provisions;
2. Unstable project description;
3. Use of a future baseline;
4. Availability of traffic data and impact assessments;
5. Non-responses planned for non-environmental comments.

Response: LAWA thanks ARSAC for its comments on the Draft EIR. LAWA acknowledges that LAWA and ARSAC entered into a Memorandum of Understanding ("MOU") in September 2016. LAWA has endeavored to respond to all of ARSAC's comments that raise significant environmental issues, as required by CEQA.

Regarding ARSAC's allegations that the LAX Airfield and Terminal Modernization Project Draft EIR does not comply with MOU provisions, LAWA has carefully reviewed the MOU and ARSAC's comments concerning the MOU. LAWA believes the LAX Airfield and Terminal Modernization Project Draft EIR complies with the MOU's requirements. LAWA believes the LAX Airfield and Terminal Modernization Project Draft EIR appropriately takes the MOU into account, and that the EIR's project description, environmental baseline, transportation analysis, and responses to comments comply with CEQA's requirements. These specific issues are further discussed below in response to ARSAC's

comments regarding the same. In particular, please see Response to Comment ATMP-PC038-2 regarding compliance with the MOU provisions, Response to Comment ATMP-PC038-5 regarding the Project description, Topical Response TR-ATMP-G-3 regarding the environmental baseline used in the Draft EIR, Topical Response TR-ATMP-T-1 and Response to Comment ATMP-PC038-9 regarding the transportation analysis, and Response to Comment ATMP-PC038-10 regarding non-environmental comments.

ATMP-PC038-2

Comment: I. THE PROJECT FAILS TO COMPLY WITH MOU PROVISIONS

Since its founding in 1995, ARSAC has been advocating for increased utilization of unconstrained, outlying regional airports such as Ontario and Palmdale instead of expanding LAX. ARSAC supports a safe, secure, modern and convenient LAX so long as LAX does not expand into surrounding LAX communities.

ARSAC has supported the implementation of the Landside Access Modernization Plan ("LAMP") as a part of the MOU. ARSAC expects that LAWA hold up its end of the MOU with regard to the Airfield and Terminal Modernization Project ("ATMP"), specifically decommissioning of all 18 West Remote gates, gate caps and gate configuration requirements and the scope of the Interim North Airfield Safety Improvement Program ("I-NASIP").

ARSAC has regularly provided comments on environmental documents and has produced a number of position papers on LAX and regionalization of air travel in Southern California. ARSAC has also been a party to key legal settlements with LAWA: the 2006 Stipulated Settlement Agreement ("SSA") and the 2016 ARSAC-LAWA MOU. Both of the settlements have provided requirements on LAWA to limit the number of passenger gates. In the 2006 Stipulated Settlement Agreement, Section X provided that LAWA limited the number of gates at LAX to 153 gates. Section X, Paragraph Y noted that the number of gates would be lowered to 153 gates if LAWA performed a Specific Amendment Study ("SPAS"). All of the SPAS alternatives limited LAX to 153 passenger gates. In 2013, the Board of Airport Commissioners ("BOAC"), the Los Angeles City Council and Mayor Antonio Villaraigosa approved SPAS. In 2016, ARSAC and LAWA settled litigation over SPAS which resulted in the MOU. The MOU incorporated the 153 gate cap section from the SSA and extended the 153 gate cap from December 31, 2020 to December 31, 2024. In addition, the MOU provided that if LAWA issued Notices of Preparation ("NOPs") for relocation of the West Remote Gates, then terminal specific gate limitations would be in effect until December 31, 2030.

Before the preparation of the ATMP NOP for the CEQA EIR and NEPA Environmental Assessment ("EA"), LAWA invited ARSAC board members to see a presentation of the project and to make comments. ARSAC President Denny Schneider, Vice President Robert Acherman and board members Danna Cope and David Mishelevich attended both meetings. At the first meeting, Denny Schneider gave LAWA Deputy Executive Director Samantha Bricker a hard copy of the MOU. During both meetings and in subsequent correspondence by ARSAC to LAWA Planning Deputy Evelyn Quintanilla, it

was clearly stated that the EIR must include reference to the MOU. When the NOP was issued, it appeared that some of the elements of the MOU were to be included in the DEIR such as the decommissioning of all 18 of the West Remote Gates. When LAWA released the ATMP DEIR on October 29, 2020, all of the alternatives failed to include removal of the 18 West Remote gates and the planned gate configurations violated the provisions of the MOU. It is clear to ARSAC that LAWA disregarded the MOU and LAWA's obligations under the MOU. LAWA's excuse for retaining any number of West Remote gates for "operational flexibility" flies in the face in LAWA's long-term goal of decommissioning the West Remote gates as shown in the City of Los Angeles's approval of LAX Master Plan Alternative D in 2004, the Federal Aviation Administration Record of Decision (ROD) on Alternative D in May 2005 (page 17, https://www.faa.gov/airports/environmental/records_decision/lax/media/rod_los_angeles.pdf), the 2006 SSA (Section IV, Gates) and the 2016 MOU (Appendix A, Section II, Paragraph B).

When LAWA issued the ATMP NOP on April 4, 2019, it activated MOU Appendix A, Section II provisions. Since LAWA declared in the MOU that all 18 of the West Remote gates would be decommissioned (Exhibit A, Section 2, Paragraph B), this NOP served as the first and final in a series of NOP to decommission the West Remote Gates. Not only is the 153 gate cap from the 2006 SSA in effect to December 31, 2024, there are additional provisions that extend gate controls out to December 31, 2030. These gate controls include terminal or groups of terminal specific gate limits, gate size limitations of no smaller than an Aircraft Design Group III size, no bifurcation of gates (i.e. use of Multiple Apron Ramp System "MARS" gates) and no double-parking of aircraft at passenger gates (i.e. an aircraft loading or unloading passengers from two distinct gates). Another provision regards the one-for-one replacement of West Remote Gates into the Passenger Terminal Modernization Area ("PTMA") into either the Midfield Satellite Concourse ("MSC") Phase 2 (South), a northerly extension of the Tom Bradley International Terminal, into the proposed Concourse 0 and/or proposed Terminal 9. As indicated in the ATMP NOP, the American Eagle gates east of Sepulveda are to be relocated of the already approved MSC project.

	MOU	Project	Alt 1	Alt 2	Alt 3	Alt 4
West Remote Gates	0	3	6 to 9	9	3	3
Bifurcated gates	No	Yes, MSC, CO and T9	Yes, MSC	Yes, MSC and C0	Yes, MSC and T9	Yes, MSC, CO and T9
T1, T2, T3 gate limits	40	38	38	38	38	38
TBIT gate limits	19	19	19	19	19	19
T4, T5, T6, T7, T8 gate limits	64	66	66	66	66	66
MSC North gate limits	12	15*	15*	15*	15*	15*
American Eagle	0	0	0	0	0	0
MSC South	Note 1	8	8	8	8	8

	MOU	Project	Alt 1	Alt 2	Alt 3	Alt 4
Bradley North	Note 2	0	0	0	0	0
Concourse 0	Note 2	8	0	8 to 11*	0	8 to 11*
Terminal 9	Note 2	12 to 18*	0	0	12 to 18*	12 to 18*

(*) : Bifurcated gates
Note 1: Gates from American Eagle facility moving to MSC South for 8 gates.
Note 2: West Remote Gates can be relocated to Bradley North, MSC South, proposed Concourse 0 and/or Terminal 9.
LAX ATMP DEIR 2.4.2.3 Removal/Replacement of West Remote Gates
"In summary, the accounting of gates associated with Concourse 0, Terminal 9 and the West Remote Gates depends upon their utilization by aircraft type, in terms of narrowbody aircraft or widebody aircraft, which can vary over time, even during the course of the day."

Response: LAWA acknowledges ARSAC's statement summarizing its advocacy efforts and support for a safe, secure, modern, and convenient LAX.

This comment states that LAWA has not complied with its obligations under the 2016 MOU between ARSAC and LAWA. The 2016 MOU arose out of a lawsuit filed by ARSAC challenging LAWA's approval of a Specific Plan Amendment Study (SPAS) and related

CEQA analysis. (*Alliance for Regional Solution etc. v. City of Los Angeles*, Ventura County No. 56-2014-00451038-CU-WM-OXN.) The trial court in that case denied ARSAC's CEQA petition. ARSAC appealed the trial court's decision. While the appeal was pending, LAWA and ARSAC entered into the MOU. Under the MOU, ARSAC dismissed its appeal and agreed not to challenge or otherwise negatively affect implementation of certain projects at LAX, including the development of new passenger gates facilities within an area of LAX that encompasses the proposed locations for Concourse 0 and Terminal 9, and LAWA agreed to undertake various procedural and operational actions at LAX. The MOU contains a variety of detailed provisions applicable to both ARSAC and LAWA.

This response does not attempt to provide a detailed description of the MOU. Rather, the response refers, as appropriate, to specific text in the MOU. The reader is referred to the MOU itself, which is provided as Attachment F1 of the Final EIR.

As related to ARSAC's comments on the LAX Airfield and Terminal Modernization Project Draft EIR, LAWA has reviewed carefully ARSAC's comments referring to the 2016 MOU and has concluded that, in many instances, those comments raise issues that are not related to the LAX Airfield and Terminal Modernization Project, are factually inaccurate, and/or do not require a written response in the Final EIR because they do not "rais[e] significant environmental issues" concerning the proposed Project. (State CEQA Guidelines, § 15088, subd. (a).) LAWA has, however, provided responses to ARSAC's comments to the extent they "rais[e] significant environmental issues" concerning the proposed LAX Airfield and Terminal Modernization Project. Responses to these comments are provided below in response to ARSAC's comments regarding the same.

The following information is provided to clarify certain factual issues raised in this comment.

Passenger Gate Limitation. Regarding the LAX passenger gate limitations cited in the comment, the proposed LAX Airfield and Terminal Modernization Project would not result in more than 153 gates before December 31, 2024. The LAX Airfield and Terminal Modernization Project is therefore consistent with the ARSAC / LAWA MOU. For additional information on the number of gates at LAX, and the manner in which the proposed Project would affect the number of gates, please see Draft EIR Section 2.4.2 and Topical Response TR-ATMP-G-2.

West Remote Gates. Regarding the West Remote Gates, the ARSAC / LAWA MOU states that "LAWA may propose a West Remote Gate Relocation Program to replace the eighteen (18) remote passenger gate areas that are currently available for regular use west of Taxiway AA at LAX (the 'West Remote Gates') with new passenger gate facilities (the 'Relocated Gates') .... LAWA may decide to initiate the West Remote Gate Relocation Program through the issuance of one or a series of CEQA NOPs." The MOU also provides, "[i]n implementing the West Remote Gate Relocation Program ..., LAWA may issue NOPs for proposed development of passenger aircraft gates ... in any phase or sequence that LAWA chooses in its sole discretion…" The MOU does not require that LAWA remove all 18 West Remote Gates as part of the proposed Project, and the NOP for the proposed LAX Airfield and Terminal Modernization Project did not suggest that all 18 of the West Remote Gates would be decommissioned as part of the proposed

Project. For additional information on the West Remote Gates, please see Topical Response TR-ATMP-G-2 and Responses to Comments ATMP-PC038-41 and ATMP-PC038-44.

Terminal-Specific Gate Limits. Regarding the comment that issuance of the LAX Airfield and Terminal Modernization Project NOP "activated" certain terminal-specific gate limits in the MOU, these terminal-specific gate numbers have not been triggered. Pursuant to the MOU, the terminal-specific numbers in the MOU only apply if and when LAWA "issues the last NOP for the West Remote Gate Relocation Program." The LAX Airfield and Terminal Modernization Project NOP proposed decommissioning some, but not all, of the 18 West Remote Gates. It is also not correct that the MOU requires LAWA to replace West Remote Gates with gates within the Passenger Terminal Modernization Area ("PTMA") on a one-for-one basis. The PTMA is a geographic area at LAX depicted in Exhibit D to the ARSAC MOU (provided in Attachment F1 of the Final EIR). The MOU neither says nor implies that LAWA must replace West Remote Gates with gates within the PTMA on a one-for-one basis. For additional information on Midfield Satellite Concourse Gates and West Remote Gates, please see Topical Response TR-ATMP-G-2.

The balance of comment ATMP-PC038-2 does not raise significant environmental issues concerning the proposed LAX Airfield and Terminal Modernization Project, and no further response is required.

ATMP-PC038-3

Comment: LAWA also failed to include any discussion of ARSAC's request to have completion of the Runway Status Lights ("RWSL") and the installation of Enhanced Final Approach Runway Occupancy Signal ("eFAROS") included as components of the Airfield Element of the DEIR. This was listed on Attachment 1 to Exhibit A of the MOU as well as in ARSAC's NOP comment letters and conversations with Evelyn Quintanilla. ARSAC has strongly advocated for safety improvements at LAX including improved airfield signage and lighting and enhanced taxiway and runway markings. ARSAC was a leader in getting FAA approval of the Runway Status Lights (RWSL) system at LAX which has dramatically reduced runway incursions at LAX. ARSAC has and will continue to insist that LAWA and the City of Los Angeles lobby the FAA for at least 47 controllers to be assigned to the LAX tower full time. Finally, ARSAC's advocacy for eFAROS is to add another layer of protection to warn pilots if it is not safe to land on a runway.

Response: The commenter states that the LAX Airfield and Terminal Modernization Project Draft EIR did not include completion of Runway Status Lights (RWSL) or installation of Enhanced Final Approach Runway Occupancy Signal (eFAROS) as part of the components of the proposed Project's airfield improvements. As described in Section 2.4.1 of the Draft EIR, the main components of the proposed airfield improvements are the relocation and reconfiguration of runway exits in the north airfield, the westerly extension of Taxiway D, the easterly extensions of Taxiways D and E to provide access to the proposed Concourse 0, and the easterly extension of Taxilane C.

With regard to the RWSL systems in the north airfield, the FAA intends to maintain the runway status lights that are currently in place and to upgrade runway status light components while various runway and taxiway surfaces would be closed in 2023 and 2024 for construction of the LAX Airfield and Terminal Modernization Project airfield improvements. Currently, the FAA is coordinating internally with LAWA regarding the replacement (or relocation) of existing runway status lights (runway entrance lights) on Taxiways Y and Z.

From the perspective of CEQA, upgrades to the RWSL in the north airfield is considered to be a cumulative project. Section 3.4 of the Draft EIR has been revised to identify this project as a cumulative project. Please see Chapter F3, Corrections and Clarifications to the Draft EIR. Because the installation of the RWSL would occur concurrently with the construction of the proposed Project north airfield improvements, no new cumulative impacts would occur from the addition of this project to the cumulative projects list.

As part of the proposed Project, the relocation and reconfiguration of the runway exits in the north airfield would include installation of updated signage and lighting, including lighting compatible with FAA's RWSL system. Section 2.4.1.2 of the Draft EIR has been revised to clarify that installation of lighting compatible with FAA's RWSL system for the four new runway exits is part of the proposed Project. Please see Chapter F3, Corrections and Clarifications to the Draft EIR.

With regards to FAA's enhanced Final Approach Runway Occupancy Signal (eFAROS), in 2015, FAA terminated their eFAROS research and development efforts and the prototype technology is not currently available for use in the National Airspace System.[1] As a result, LAWA has no plan to install eFAROS at LAX.

The comment regarding the number of air traffic controllers at LAX is noted. The management and staffing of the air traffic control tower is outside the scope of the LAX Airfield and Terminal Modernization Project. Moreover, LAWA has no authority over FAA's staffing of the control tower.

[1] Paul Fontain, Director, NextGen Portfolio Management & Technology Development, U.S. Federal Aviation Administration, Letter to Robert Falcon, Deputy Executive Director, Development Group Enterprise Services Division, Los Angeles World Airports, June 25, 2021.

ATMP-PC038-4

Comment: Furthermore, LAWA failed to lease land to the AQMD to set up an air quality monitoring location. Moreover, data gathered from this site would have been useful in the ATMP DEIR to understand the effects of airport operations and surrounding traffic on airport neighbors, airport workers and the traveling public.

Response: The Draft EIR's air quality analysis relies on accurate and appropriate data. As discussed on page 4.1.1-29 in Section 4.1.1 of the Draft EIR, the monitoring station that is most

representative of existing air quality conditions in the Project area is the Southwest Coastal Los Angeles Monitoring Station located at 7201 W. Westchester Parkway (referred to as the LAX Hastings site). This station is less than 0.5-mile from Runway 6L-24R (northernmost LAX runway) and criteria pollutants monitored at the station include ozone, carbon monoxide, sulfur dioxide, nitrogen dioxide, and PM10. Because of the proximity of the monitoring station to the airport and shared similar geography, the LAX Hastings monitoring station accurately represents air quality in the airport vicinity and, therefore, it was used both to summarize existing conditions and for air dispersion modeling. Use of this station is consistent with the South Coast Air Quality Management District's (SCAQMD) requirements for air quality analysis.

Regarding the statement that LAWA "failed to lease land to the AQMD to set up an air quality monitoring station," this comment does not raise significant environmental issues concerning the proposed LAX Airfield and Terminal Modernization Project, and no further response is required.

ATMP-PC038-5

Comment: II. THE DEIR FAILS TO PROVIDE A STABLE PROJECT DESCRIPTION

The DEIR's Project definition is unstable because of multiple gate configurations which are also prohibited by the MOU. The multiple gate configurations include bifurcation, and use of MARS gates.

The DEIRs failure to provide a stable project description violates CEQA. (Cal. Code Regs., tit. 14 ["CEQA Guidelines"] § 15124; *Cty. of Inyo v. City of Los Angeles* (1977) 71 Cal. App. 3d 185, 193 ["An accurate, stable and finite project description is the Sine qua non of an informative and legally sufficient EIR."].) "A curtailed or distorted project description may stultify the objectives of the reporting process." (*Cty. of Inyo,* supra, 71 Cal.App.3d 185, 192.) The DEIR fails this requirement because it calls for multiple gate configurations that are prohibited by the MOU. The DEIR must specify a "stable proposed project," and not merely present a list of alternatives or potential project proposals. (*Washoe Meadows Community v. Department of Parks and Recreation*, 17 Cal.App.5th 277, 288.) "[F]or a project to be stable, the DEIR, the FEIR, and the final approval must describe substantially the same project." (Ibid.) Failure to present a stable project description obstructs CEQA's informational requirements by "present[ing] the public with a moving target and requir[ing] a commenter to offer input on a wide range of alternatives that may not be in any way germane to the project ultimately approved." (Ibid.)

In a more recent case, *Stopthemillenniumhollywood.com v. City of Los Angeles* (2019) 39 Cal.App.5th 1 ("*Millennium*"), the appellate court upheld a ruling that a project description was inadequate under CEQA when the EIR failed to specify "the siting, size, mass, or appearance of any building proposed to be built at the project site." (Id. at 18.) Rather, the project EIR provided an "impacts envelope" with "conceptual" designs. (Ibid.) The DEIR thus cannot propose multiple, conceptual configurations of the project design.

Response: The commenter states that the Project definition is "unstable because of multiple gate configurations…" and cites to cases that emphasize the need for an accurate, stable, and finite project description. (See *County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 193 ["An accurate, stable and finite project description is the Sine qua non of an informative and legally sufficient EIR."]; *Stopthemillenniumhollywood.com v. City of Los Angeles* (2019) 39 Cal.App.5th 1.) This statement is incorrect. The Draft EIR's project description does not violate CEQA. The Draft EIR complies with CEQA and properly articulates the possible number of gates and fully discloses the maximum possible scope of the Project. (See *South of Market Community Action Network v. City and County of San Francisco* (2019) 33 Cal.App.5th 321, 334 [upholding as compliant with CEQA an EIR that "carefully articulated two possible variations and fully disclosed the maximum possible scope of the project," finding that this "enhanced, rather than obscured, the information available to the public."].)

Section 2.4 of the Draft EIR describes gates at both Concourse 0 and Terminal 9. Specifically:

- "Concourse 0 is planned … with up to 11 narrowbody aircraft gates that would attach to, and extend to the east of, Terminal 1. The two westernmost gates at Concourse 0 would replace the two easternmost existing gates at Terminal 1. The resulting net increase [would be] up to nine new narrowbody gates." (Draft EIR, p. 2-24.) The primary operator at Concourse 0 is expected to be Southwest Airlines, which currently has only narrowbody aircraft in its fleet. (Draft EIR, p. 2-38.)

- "Terminal 9 is planned as an international and domestic terminal facility with up to 12 to 18 gates and the capability to support ADG VI operations." (Draft EIR, p. 2-27.) Terminal 9 would primarily serve international flights that tend to use widebody aircraft; therefore, the primary use of Terminal 9 is anticipated to be for widebody aircraft. As the Draft EIR states, "[t]he range of 12 to 18 gates is based on aircraft size, with Terminal 9 being able to accommodate up to 12 widebody aircraft or up to 18 narrowbody aircraft. Given that Terminal 9 would primarily serve international flights that tend to use widebody aircraft, the primary use of the subject facility is anticipated to be for widebody aircraft." (Draft EIR, p. 2-27.)

The operational analysis and the environmental impact evaluation assumed operation of 11 narrowbody gates at Concourse 0. That assumption is appropriate because the primary operator at Concourse 0 is expected to be Southwest Airlines. The Draft EIR's description of gating configurations at Concourse 0 and Terminal 9 is not unstable. Rather, the description reflects the fact that activity at airports can change over time. Therefore, while it is anticipated that Concourse 0 would serve primarily narrowbody aircraft and Terminal 9 would serve primarily international flights that tend to use widebody aircraft, the Draft EIR discloses the number of gates that could be accommodated at Concourse 0 and Terminal 9 associated with a different fleet mix at each facility.

A detailed accounting of the number of gates with implementation of the proposed Project is provided in Table 2-2 of the Draft EIR. The gate layouts for Concourse 0 and

Terminal 9 are illustrated in Exhibit 2-3 in Appendix B.2 of the Draft EIR. The gate layout shows that Multiple Aircraft Ramp System (MARS) gates could be used at Concourse 0 and Terminal 9. This does not mean that the project description is unstable. Rather, this information accurately portrays that the planned facilities would be able to accommodate different aircraft sizes, much like a curb can accommodate both large and small vehicles. This is consistent with the way LAWA has depicted gate layouts in the past, which clearly shows the ability of various gates to accommodate different aircraft types and resulting gate dependencies. Please see Response to Comment ATMP-PC038-50 for additional discussion regarding the use of MARS gates and Response to Comment ATMP-PC038-52 for additional information regarding the use of narrowbody and widebody gates associated with the proposed Project.

Because LAWA cannot control the type of aircraft in each airline's fleets, LAWA must plan to the best of its ability to accommodate the predicted airline fleets. Because Concourse 0 is expected to have mainly narrowbody aircraft, the Draft EIR thoroughly analyzes the impacts of the maximum possible number of gates, provides an illustration of what the gates may look like (Figure 2-8), provides the predicted square footage, and analyzes impacts using conservative assumptions. Unlike *Stopthemillenniumhollywood.com v. City of Los Angeles* (2019) 39 Cal.App.5th 1, to which the commenter cites, the proposed Project Draft EIR includes multiple site plans, figures, building elevations and architectural renderings (Figures 2-9, 2-10, 2-11, 2-12) to meet State CEQA Guideline requirements. (See State CEQA Guidelines § 15124 [requiring a "general description of the project's technical, economic and environmental characteristics…"].) Similar to Concourse 0, the Draft EIR provides a thorough analysis of the gates proposed at Terminal 9 and provides the general information required by CEQA, including architectural renderings and plans. (See Figures 2-13, 2-14, 2-15, 2-16.)

Unlike *Washoe Meadows Community v. Department of Parks and Recreation* (2017) 17 Cal.App.5th 277, 285, to which the commenter cites, the range of gates at Concourse 0 and Terminal 9 does not represent "very different alternatives" as potential projects. Instead, the Draft EIR identifies the proposed Project and then further discusses the maximum possible scope of the Project. This approach is consistent with CEQA.

Please see Response to Comment ATMP-PC038-2 regarding comments pertaining to compliance with the MOU.

ATMP-PC038-6

Comment: III. THE DEIR IMPROPERLY USES A FUTURE PROJECT BASELINE

The DEIR improperly uses a future project baseline for the Project and for the traffic study, in contravention of CEQA. Under CEQA Guidelines section 15125, subdivision (a), the baseline must "describe physical environmental conditions *as they exist at the time the notice of preparation is published, or if no notice of preparation is published*, at the time environmental analysis is commenced, from both a local and regional perspective." (Emphasis added.) An EIR may deviate to use projected future conditions as the sole baseline "only if it demonstrates with substantial evidence that use of existing conditions

would be either misleading or without informative value to decision-makers and the public. Use of projected future conditions as the only baseline *must be supported by reliable projections based on substantial evidence in the record*." (CEQA Guidelines § 15125, subd. (b), emphasis added.)

The Notice of Preparation ("NOP") for this project was published in April 2019; therefore, the appropriate baseline for the ATMP DEIR under CEQA Guidelines section 15125, subdivision (a) would be 2019. However, in the ATMP DEIR, LAWA is seeking to use a 2023/2024 baseline for certain noise, air quality, and greenhouse gas impacts associated with temporary runway closures, as well as a 2028 baseline for the traffic study. (DEIR, p. 4-3 to 4-4.) ARSAC is concerned that using these baseline years, years which have not yet occurred, will provide a false basis for determining project impacts. Although commercial air traffic is currently down 75% from this time period one year ago due to COVID-19, the collective opinions of the airlines, aircraft manufacturers and airline trade associations is that air travel will recover to 2019 levels by 2023 or 2024. The California Supreme Court has recognized that use of a future baseline without a discussion of current conditions is a 'departure from the norm' and should only apply if 'justified by unusual aspects of the project or the surrounding conditions." (*Neighbors for Smart Rail v. Exposition Metro Line Construction Authority* (2013) 57 Cal.4th 439, 451.) A lead agency needs to provide a well-documented and reasoned justification for choosing a baseline year later than the publication of the NOP. (Id. at 460.)

Response: The Introduction to Chapter 4, Environmental Impact Analysis, of the Draft EIR provides a complete explanation of the environmental baseline used in the analyses of potential impacts associated with the proposed Project. Specifically, the discussion on pages 4-2 through 4-4 of the Draft EIR explains the basis for using existing physical conditions (2018/2019) as the baseline in addressing impacts, pursuant to Section 15125(a) of the State CEQA Guidelines, and also explains the basis for using a projected future conditions baseline where, pursuant to Section 15125(a)(2) of the State CEQA Guidelines, "[the] use of existing conditions would be misleading or without informative value to decision-makers and the public."

As explained on page 4-3 of the Draft EIR, 2018 is the environmental baseline for the analysis of certain operational impacts, in light of the fact that a full year's worth of operational data is available for 2018, but would not be the case if April 2019 was used as the environmental baseline for the evaluation of operational impacts, as suggested by the commenter. As further explained on pages 4-3 and 4-4 of the Draft EIR, the evaluation of potential aircraft noise, air quality, and greenhouse gas (GHG) impacts associated with the temporary closure of runways necessary to construct proposed improvements in the north airfield of LAX (described in Section 2.6.4), is based on aircraft operations projected to occur in 2023 and 2024 - the years when each runway closure is anticipated to occur – as the environmental baseline. This is because during the 4.5 months in each of the two years with a runway closure, aircraft operations at LAX would be redistributed among the remaining three runways. By assuming 2023 and 2024 for baseline conditions, instead of 2018, the impacts analysis accounts for the five to six interim years of growth in aircraft operations projected to occur at LAX. If 2018 was assumed as the baseline year, the analysis of these impacts would not accurately account for the increase in aircraft operations expected to occur by 2023/2024. In these

instances, using 2018 as the baseline would be misleading and without informative value since it would not accurately capture the temporary impacts that would occur due to runway closure. This approach is appropriate because LAX is a dynamic facility, and conditions are generally not static over time. In particular, the level of aircraft operations that will exist in 2023 and 2024 will differ from those conditions that existed in 2018. It is, therefore, appropriate to adjust the baseline to reflect these anticipated conditions as of 2023 and 2024. This approach is conservative because the number of aircraft operations is expected to increase between 2018 and 2023/2024. As a result, the Draft EIR's use of a 2023/2024 baseline involves more aircraft operations, and therefore discloses greater impacts, than would occur if the Draft EIR used a 2019 baseline as the commenter suggests. Moreover, as described on page 4.7.1-31 in Section 4.7.1.4 of the Draft EIR, by comparing impacts to 2023 and 2024 conditions, instead of 2018, the analysis accurately identifies temporary short-term noise impacts that would occur as a direct consequence of temporary runway closures during project construction. It would be misleading and of no informational value to use 2018conditions as the baseline for this analysis, as the difference in noise levels would be partially attributable to growth in aircraft operations projected to occur at LAX rather than solely due to the temporary runway closures.

With regard to the use of a projected future conditions baseline in the evaluation of potential impacts to transportation, the discussion on page 4-4 of the Draft EIR notes that one of the objectives of the proposed Project is to complete construction of the proposed Project prior to the 2028 Olympic and Paralympic Games scheduled to be held in Los Angeles. Substantial evidence in the record demonstrates that, by year 2028, Phase 1 of the LAX Landside Access Modernization Program, including the Automated People Mover (APM), Intermodal Transportation Facility (ITF) East, ITF West, Consolidated Rental Car Facility (CONRAC), Phase 1 roadways, and a connection to the Airport Metro Connector 96th Street Transit Station, will be completed. Specifically, Phase 1 of the LAX Landside Access Modernization Program is approved, funded, under construction, and scheduled for completion well before 2028. For this reason, it would be misleading and without informative value to analyze the Project's impacts at buildout in 2028 without accounting for the APM, ITF East, ITF West, CONRAC, and other LAX Landside Access Modernization Program Phase 1 improvements. These improvements will substantially change the surface transportation characteristics around the airport, including as related to vehicle miles traveled (VMT). Therefore, projected future conditions in year 2028 are used as the sole baseline for the transportation impact analysis since use of existing conditions (2018/2019) as the baseline would be misleading and without informative value to decision-makers and the public. That basis for utilizing a projected future conditions baseline for the transportation impacts analysis is also reiterated in the methodology discussion in Section 4.8 Transportation of the Draft EIR.

In summary, the Draft EIR provides a clear and complete explanation, with supporting substantial evidence, regarding the environmental baseline used in the evaluation of potential impacts associated with the proposed Project.

With regards to the commenter's assertion regarding air travel levels in light of the COVID-19 pandemic, please refer to Topical Response TR-ATMP-G-1.

ATMP-PC038-7

Comment: With regards to the noise, air quality, and greenhouse gas impacts analyses associated with temporary runway closures, the DEIR uses a baseline of 2023 or 2024, the year of each anticipated temporary runway closure. (DEIR, p. 4-3.) For 4.5 months during each of these years when a runway closure occurs, aircraft operations will be redistributed to the remaining three runways. (DEIR, p. 4-3.) The DEIR states that this baseline is appropriate because it "accounts for the five to six interim years of growth in aircraft operations projected to occur at LAX." (DEIR, p. 4-3.) This conclusory statement does not provide substantial evidence that the use of existing conditions would be misleading. (See *Concerned Citizens of Costa Mesa, Inc. v. 32nd Dist. Agricultural Assn*. (1986) 42 Cal.3d 929, 935 ["[T]he EIR must contain facts and analysis, not just the agency's bare conclusions or opinions."].) The DEIR states without supporting evidence that "the level of aircraft operations that exist in 2023 and 2024 will differ from those conditions that existed in 2019." (DEIR, p. 4-3.) The supposition that the aircraft conditions in 2023 and 2024 "will differ" from those in 2019 is not sufficient to justify a deviation from the 2019 baseline. The DEIR must instead make a showing of substantial evidence that use of a 2019 baseline would be misleading or without informational value. The DEIR has not done that here. LAWA fails to provide a justification except that using 2018 as a baseline would be confusing. This is not an argument backed by substantial evidence. While the volume of air traffic is currently down due to the COVID-19 pandemic, air travel is expected to recover beyond 2022.

Response: The commenter is incorrect that the Draft EIR does not provide substantial evidence relative to the Draft EIR's statement that projected future conditions baseline used in the analysis of the temporary runway closures accounts for the five to six interim years (i.e., between 2018 and 2023/2024) of growth in aircraft operations projected to occur at LAX. Table 4-1 in Appendix B1, Activity Forecasts Report, of the Draft EIR identifies the number of annual aircraft operations projected to occur for each year during that period. As indicated therein, forecasted annual operations in 2018 are 715,000, and in 2023 and 2024 are 752,000 and 760,00, respectively. As such, the Draft EIR provided substantial evidence that the level of aircraft operations that are projected to occur in 2023 and 2024 will differ from those conditions that existed in 2019.

For an explanation of the substantial evidence that supports the Draft EIR's use of a projected future conditions baseline in evaluating certain impacts, please refer to Response to Comment ATMP-PC0038-6. With regards to the commenter's assertion regarding air travel levels in light of the COVID-19 pandemic, please refer to Topical Response TR-ATMP-G-1.

ATMP-PC038-8

Comment: With regards to the transportation analyses, the DEIR claims for measuring VMT impacts, a 2028 baseline is necessary to account for several transportation improvements that will have been completed at that time, which may impact traffic at the Project site. (DEIR, p. 4-4, 4.8-33 to 4.8-37.) Yet the DEIR does not provide substantial evidence that using a 2019 baseline would be misleading or have no informative value. In fact, the model

calculating the 2028 baseline itself uses some assumptions based on 2019 data. (DEIR, p. 4.8-36 ["[T]he 2019 data was used to provide the basis for the assumptions on where trips would start/end at a variety of airport facilities."].) The existing conditions for 2019 show a much smaller VMT (6,581,811) than the projected baseline of 2026 (8,676,209). (DEIR, p. 4.8-41.) This difference of over 2 million VMT will artificially and unjustifiably inflate the Project baseline, and thereby minimize the Project's potential impacts.

LAWA has claimed in the EIR that the number of passengers and associated vehicle traffic will increase whether or not the project is done. In addition, the ground traffic has existed prior to the project start. The introduction of new roadways to mitigate LAX ground traffic is not creating a new activity where there has been none before as new activity traffic was created in the case of the Metro Expo Line.

Response: The fact that the ground transportation improvements associated with the LAX Landside Access Modernization Program will affect the existing (2019) Vehicle Miles Traveled (VMT) characteristics, separate and apart from the proposed Project, is evidenced by the data presented in Table 4.8-13 on page 4.8-51 of the Draft EIR. As indicated therein, the VMT per employee for Existing Conditions (2019) is 25.2, which would be reduced to 24.0 in the Projected Future Conditions (2028). That reduction in VMT is attributable to the improvements associated with the LAX Landside Access Modernization Program. As explained in the Draft EIR, there is substantial evidence that those improvements will be completed by 2028 regardless of the proposed Project. Specifically, Phase 1 of the LAX Landside Access Modernization Program is approved, funded, under construction, and scheduled for completion well before 2028.

As indicated in Table 4.8-13 of the Draft, the VMT per employee for proposed Project (2028) conditions is 23.9. If the Draft EIR were to use Existing Conditions (2019) as the baseline for measuring VMT impacts, that would misleadingly suggest that implementation of the proposed Project would result in a reduction of 1.3 in VMT per employee; however, 92 percent of that reduction (i.e., 1.2 of the 1.3 VMT) will be directly attributable to the LAX Landside Access Modernization Program. Thus, using the 2028 baseline presents the most conservative analysis and results in a realistic and accurate disclosure of impacts attributable to the proposed Project. Implementation of the proposed Project would result in only a 0.1 VMT reduction compared to what would otherwise occur in 2028 without the proposed Project. The same holds true relative to passenger VMT when considered on a per-passenger basis using the total passenger VMT numbers in Table 4.8-13. Based on 88.3 million annual passengers (MAP) in 2019, the VMT per passenger is approximately 13.4, whereas under the Projected Future Conditions Baseline (2028), when LAX passenger levels are projected to be at 110.8, the VMT per passenger is approximately 12.8, and for proposed Project (2028) conditions is approximately 12.7. Here, too, if the Draft EIR were to use an existing (2019) baseline and not account for the VMT reduction benefits associated with the LAX Landside Access Modernization Program, which are reflected in the projected future conditions baseline, the VMT impacts associated with the proposed Project would not be accurately represented, and the associated impact conclusion would be misleading to decision-makers and the public.

ATMP-PC038-9

Comment: IV. AVAILABILITY OF TRAFFIC DATA AND IMPACT ASSESSMENTS

Although CEQA has replaced traffic congestion with Vehicle Miles Travelled (VMT), LAWA still has two responsibilities. The first responsibility is under CEQA and NEPA for air quality analysis. The second responsibility is under the City of Los Angeles Department of Transportation (LADOT) non-CEQA requirement for VMT analysis. At this point, we understand that the LADOT required data will not be available at the same time as the ATMP Final EIR. This is problematic as decision makers (i.e. Board of Airport Commissioners, Los Angeles City, Mayor Eric Garcetti, etc.) and the public will be denied the information needed to make an informed decision of all impacts of the ATMP. (*Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 515 ["The failure to comply with the law subverts the purposes of CEQA if it omits material necessary to informed decisionmaking and informed public participation."].)

Response: Please see Topical Response TR-ATMP-T-1 regarding the assessment of transportation effects associated with the LAX Airfield and Terminal Modernization Project that are not subject to CEQA, which was conducted in accordance with the City of Los Angeles Transportation Assessment Guidelines. As indicated therein, traffic congestion is no longer used as a basis for determining significant impacts for land use projects and plans in California.

The EIR includes an analysis of the proposed Project's air quality impacts, including impacts associated with vehicles traveling to and from LAX. (See Section 4.1.1.5.2 of the Draft EIR).

The Los Angeles Department of Transportation (LADOT) Traffic Assessment Guidelines (TAG) include consideration of non-CEQA issues, such as those associated with traffic congestion. LAWA completed a Non-CEQA Transportation Assessment in April 2021 for the proposed Project, in accordance with criteria and methodologies provided in the LADOT TAG. The Non-CEQA Transportation Assessment Report is available at https://www.lawa.org/atmp/documents. LAWA worked closely with LADOT on this report and recommendations. Although there is no requirement for public review and comment on the Non-CEQA Transportation Assessment, LAWA provided an approximately month-long period for members of the public to provide comments. As noted above, the non-CEQA assessment does not pertain to the environmental impacts of the proposed Project and is entirely separate from the EIR for the proposed Project. The citation to *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502 is therefore inapposite, as that case focuses on the adequacy of information and analysis that is required to be included in an EIR.

ATMP-PC038-10

Comment: V. NON-RESPONSES TO NON-ENVIRONMENTAL COMMENTS

LAWA must respond to all comments submitted regarding their DEIR and cannot bifurcate them into environmental comments that will be answered and non-environmental comments that will not be answered in the DEIR and may or may not be answered somewhere else. Many responses in the June 2017 Final EIR for the LAX Terminals 2 and 3 Modernization Project Final EIR were "No response is required because the comment does not raise any significant environmental issues or address the adequacy of the environmental analysis." As noted on page 4, ARSAC letter to LAWA CEO Justin Erbacci dated October 28, 2020: "A public agency may not overbroadly classify certain comments as "non-environmental" and then fail to respond to them." Comments by the public require a response so that issues will not be swept under the rug. (*King & Gardiner Farms, LLC v. County of Kern* (2020) 45 Cal.App.5th 814, 880 ("*KG Farms*").) CEQA Guidelines section 15088, subdivision (a) requires that "[t]he lead agency shall evaluate comments on environmental issues… and shall prepare a written response." CEQA Guidelines §15088, subd. (c) provides the following standard: "The level of detail contained in the response, however, may correspond to the level of detail provided in the comment (i.e., responses to general comments may be general)." *KG Farms* states the following rule (and finds that the response to comments was insufficient): "The detail required of a response is correlated to the detail in the comment." (*KG Farms,* supra*,* 45 Cal. App. 5th 814, 880.) So does *Covington v. Great Basin Unified Air Pollution Control District*: "The level of detail in the response may correspond to the level of detail in the comment, so that a general response is sufficient to a general comment, but a more detailed response is needed for a more detailed comment. (Cal. Code Regs., tit. 14, 15088, subd. (c).)" (*Covington v. Great Basin Unified Air Pollution Control Dist.* (2019) 43 Cal. App. 5th 867, 879.)

Response: CEQA requires that lead agencies respond to all comments raising significant environmental issues received during the Draft EIR noticed comment period. (State CEQA Guidelines, § 15088, subd. (a).) State CEQA Guidelines Section 15088, subdivision (c) also provides: "The level of detail contained in the response ... may correspond to the level of detail provided in the comment (i.e., responses to general comments may be general)." LAWA has responded to comments on the Draft EIR in accordance with the overall purpose of the EIR comment-and-response process and all CEQA requirements.

LAWA also notes, as stated in *City of Irvine v. County of Orange* (2015) 238 Cal.App.4th 526, 557-558, "[a]t its best, the comment-and-response process in CEQA produces a *better EIR*, by bringing to the attention of the public and decision makers significant environmental points that might have been overlooked.... But the comment-and-response process can also be abused. At its worst, it could become an end in itself, simply a means by which project opponents can subject a lead agency's staff to an onerous series of busywork requests and 'go fetch' demands." (Emphasis in original.) Through its responses to comments, LAWA hopes to produce a better EIR.

With respect to comments concerning the ARSAC / LAWA MOU, please see Response to Comment ATMP-PC038-2.

ATMP-PC038-11

Comment: VI. CONCLUSION

In order to fulfill the requirements of CEQA and of the MOU, ARSAC is willing to help LAWA make the necessary revisions to the ATMP EIR and develop an MOU-compliant alternative.

Response: With regards to the commenter's request that LAWA develop "an MOU-compliant alternative," please see Response to Comment ATMP-PC038-24.

ATMP-PC038-12

Comment: ARSAC, the Alliance for a Regional Solution to Airport Congestion, submits this cover letter, a comment letter from our attorneys, Chatten-Brown, Carstens and Minteer, and our comments and questions on the DEIR pursuant to ARSAC's right to submit comments under Section II of the ARSAC-LAWA Memorandum of Understanding (MOU). The purpose of the letters and the comments is to help LAWA refining the proposed AMTP to achieve greater efficiency and mitigate impacts. Furthermore, ARSAC sees that it is within its rights under the MOU to provide comments that point out deficiencies and/or errors that LAWA has self-inflicted in the ATMP environmental and other planning documents and for ARSAC to offer suggestions to remedy those deficiencies and/or errors.

Since 1995, ARSAC, a grassroots community organization, has advocated for increased utilization of legally unconstrained outlying regional airports to meet Southern California's airport capacity needs. ARSAC supports a modern, safe, secure and convenient LAX so long as LAX does not expand into surrounding airport communities. ARSAC has had two legal settlements with LAWA: the 2006 Stipulated Settlement Agreement for the LAX Master Plan Alternative D case and the 2016 ARSAC-LAWA MOU for the LAX Specific Plan Amendment Study (SPAS) case. ARSAC and LAWA negotiated the MOU in good faith. While ARSAC has a duty to cooperate, it can only do so within the scope of the law and the MOU. ARSAC has held up its side of the MOU and expects LAWA to do the same.

In summary, ARSAC believes that LAWA has failed in its obligations under the MOU and CEQA and therefore requests that LAWA remedy those failures through the introduction of new alternatives that are compliant with the MOU. In addition, ARSAC requests LAWA's consideration and incorporation of mitigation measures and policy decisions into the ATMP.

Response: The comment is noted and will be included in the Final EIR for consideration by the decision-makers prior to taking any action on the LAX Airfield and Terminal Modernization Project. Responses to this cover letter are provided in Responses to Comments ATMP-PC038-13 through ATMP-PC038-15 below. Responses to the comment letter prepared by the commenter's attorneys are provided in Responses to Comments ATMP-PC038-1 through ATMP-PC038-11. Responses to the commenter's other

comments and questions on the Draft EIR are provided in Responses to Comments ATMP-PC038-16 through ATMP-PC038-121 below.

With regards to the commenter's right to submit comments on the Draft EIR, and the commenter's assertion that LAWA has failed in its obligations under the MOU and CEQA, please see Response to Comment ATMP-PC038-1. With regards to the commenter's request that LAWA develop "new alternatives that are compliant with the MOU," please see Response to Comment ATMP-PC038-24. Responses to the commenter's comments concerning the incorporation of mitigation measures are provided in specific responses to comments throughout the remainder of this letter.

With regards to the statement that "ARSAC supports a modern, safe, secure and convenient LAX so long as LAX does not expand into surrounding airport communities," the proposed Project would not expand into surrounding airport communities. The proposed Project would require limited acquisition in the area immediately to the east of the Central Terminal Area for the purpose of constructing new airport access roadways. These acquisition parcels are not located within any of the residential communities that are located to the north, south, or east of the airport.

ATMP-PC038-13

Comment: The failure started at the outset of the ATMP Notice of Preparation (NOP) process for the EIR and Environmental Assessment (EA) when LAWA invited ARSAC to be consulted about the ATMP. To the public, the definition of "consultation" means that there is a presentation, questions and answers and agreement on a decision. LAWA's past performance in "consultation" has been a presentation and not making any changes in response to the party with whom they met. Essentially, LAWA has done this to "check the box" of claiming to have a consultation, but to the other party, this was only a briefing as their input was never considered or incorporated into LAWA's plans. In the two NOP consultation meetings ARSAC had with LAWA Chief Commercial Officer Samantha Bricker and Chief of Airport Planning Evelyn Quintanilla, ARSAC brought up the MOU in the discussion, gave Ms. Bricker a hard copy of the MOU and sent two letters (attached) emphasizing the need to follow the MOU and reference the MOU in the ATMP EIR and EA. There are project specific requirements in the MOU that LAWA must follow in pursuing the environmental and planning approvals for the AMTP. The ATMP NOP appeared to follow the MOU, but the ATMP DEIR explicitly violated the terms of the MOU. Neither the NOP nor the DEIR make any reference to the MOU. ARSAC has raised these MOU violations in writing with LAWA and has had four meetings with top LAWA Executives, but to date LAWA has not made any changes to the ATMP DEIR or forthcoming Draft EA to show MOU compliance.

Response: The comment states that LAWA has an obligation to consult with ARSAC, and to incorporate ARSAC's requests into the proposed Project as part of the consultation process.

There are two potential bases relevant to LAWA's obligation to engage in consultation with ARSAC. The first is CEQA and the State CEQA Guidelines. This obligation applies to

lead agencies generally and is not unique to LAWA or to the proposed Project. The second is the MOU between ARSAC and LAWA dated September 2016. Both are described below.

The lead agency's obligation to engage in consultation arises in the "scoping" process when the lead agency is determining the scope and content of the Draft EIR. This process is initiated by the issuance of a "Notice of Preparation," or "NOP." Once the lead agency decides that an EIR will be necessary, the lead agency must file a copy of its NOP with the county clerk and send a copy to all responsible agencies, trustee agencies, the Office of Planning and Research and "federal agenc[ies] involved in approving or funding the project." (State CEQA Guidelines, § 15082, subd. (a); Pub. Resources Code, § 21080.4.) The NOP also must be sent to "every person who has filed a written request for notices with either the clerk of the governing body or, if there is no governing body, with the director of the agency." (Pub. Resources Code, § 21092.2, subd. (a).) The NOP must include a description of the project; its location, either by street address or on a map; and a statement of the project's probable environmental effects. (State CEQA Guidelines, § 15082, subd. (a)(1).) The purpose of the NOP is to "solicit guidance from those agencies as to the scope and content of the environmental information to be included in the EIR." State CEQA Guidelines, § 15375.) The lead agency must, in preparing the Draft EIR, consider any information or comments it receives in response to the NOP. (Pub. Resources Code, § 21082.1, subd. (b); State CEQA Guidelines, § 15084, subd. (c).)

LAWA followed these procedures. LAWA issued the NOP for the LAX Airfield and Terminal Modernization Project on April 4, 2019. A copy of the NOP, including a description of the project and an initial discussion of potential environmental effects, appears at Appendix A to the Draft EIR. LAWA sent the NOP to ARSAC, among many other agencies and stakeholders. LAWA also conducted two scoping meetings, on April 13 and 17, 2019. On May 6, 2019, ARSAC submitted comments on the NOP. LAWA considered ARSAC's comments on the NOP in preparing the Draft EIR. ARSAC's May 6, 2019 letter is also included Appendix A of the Draft EIR, along with all other comments received on the NOP.

In taking these steps, LAWA met its consultation requirements under CEQA. (See *Citizens for East Shore Parks v. California State Lands Commission* (2011) 202 Cal.App.4th 549, 567–568 [rejecting claim that a lead agency had failed to properly "consult" with trustee agencies where the lead agency sent the NOP to the trustee agencies, but the trustee agencies did not respond].)

In addition to the procedures set forth above, LAWA engaged in direct consultations with ARSAC, as the comment acknowledges. These consultations included meetings between LAWA and ARSAC representatives on at least three occasions: January 23, 2019, February 2, 2020, and October 19, 2020. (See State CEQA Guidelines, §§ 15083 [lead agency "may" engage in early consultations with members of the public], 15005, subd. (c) [" 'May' identifies a permissive element which is left fully to the discretion of the public agencies involved."].)

The comment appears to suggest that these additional efforts to consult with ARSAC were insufficient because LAWA did not concur with all of ARSAC's requests. This

suggestion is incorrect because it mischaracterizes LAWA's obligations under CEQA in carrying out the consultation/scoping process. In consulting with other agencies and stakeholders, the lead agency is not required to accept the requests made by those participating in the consultation process. Instead, the lead agency is directed to "consider" information provided during the scoping process. (Pub. Resources Code, § 21082.1, subd. (b); State CEQA Guidelines, § 15084, subd. (c).) In this case, LAWA did consider ARSAC's input, along with the input provided by other agencies and stakeholders.

The comment appears to suggest that, even if LAWA was not required to reach agreement with ARSAC as part of the scoping/consultation process, then LAWA was required to do so pursuant to the ARSAC / LAWA MOU.

LAWA considered carefully whether the proposed Project and EIR were consistent with LAWA's obligations as set forth in the ARSAC / LAWA MOU. LAWA believes the Draft EIR complies with the MOU's requirements. Many of the provisions in the MOU address facilities other than those involved in the proposed Project. No response to the allegations regarding those provisions is required by LAWA in this CEQA process. For additional information regarding the MOU, and its relevance to the proposed Project, please see Response to Comment ATMP-PC038-2.

In addition, the MOU does not include an express or implied obligation to consult with ARSAC in connection with the LAX Airfield and Terminal Modernization Project EIR. Even if the MOU did include such obligation, as explained above, LAWA consulted with ARSAC through both the CEQA scoping process and through direct meetings with ARSAC that went beyond the CEQA scoping process.

Neither the MOU nor CEQA defines the term "consult." The comment describes the term "consult" as follows: "To the public the definition of 'consultation' means that there is a presentation, questions and answers and agreement on a decision." This description is inaccurate. The dictionary definition of "consult" is "to have regard to," "to consider," or "to ask the advice or opinion of." The term therefore means to solicit information, and then to consider that information. LAWA solicited information from ARSAC, both as part of the CEQA process and in separate meetings. LAWA considered the information provided by ARSAC in preparing the Draft EIR. The comment appears to contend that LAWA did not consider this information. LAWA respectfully disagrees. The comment also appears to contend that "consultation" means that LAWA and ARSAC had to reach agreement regarding the subject matter. The definition of "consult" does not support this contention. Nor does the MOU.

Finally, although the comment appears to suggest otherwise, the MOU does not require the Draft EIR to identify or describe the MOU. Although such a discussion is not required by either CEQA or the MOU, LAWA, in its discretion, has included a copy of the MOU as an attachment to the Final EIR. (See Final EIR, Attachment F1.)

For additional information on the ARSAC / LAWA MOU and provisions concerning the number and operation of gates, please see Topical Response TR-ATMP-G-2 and Response to Comment ATMP-PC038-2.

ATMP-PC038-14

Comment: These failures include, but are not limited to:

1. Exceeding the 2024 and 2030 gate caps in the MOU Exhibit A, Section II.
2. Not relocating of all 18 West Remote Gates into the Passenger Terminal Modernization Area (PMTA) on a 1-for-1 basis.
3. Violating the prohibition on bifurcation of gates through the use of Multiple Apron Ramp System (MARS) gates.
4. Exclusion of Enhanced Final Approach Runway Occupancy Signal (eFAROS) in the Interim North Airfield Safety Improvements Project (I-NASIP).
5. Lack of a lease between LAWA and the Southern California Air Quality Management District (AQMD) for an air quality monitoring site near LAX.
6. CEQA violations such as improper use of future baseline years and failure to respond to non-CEQA comments in the EIR.

Our attorneys have addressed these legal failures in detail in their letter.

Response: The comment states that LAWA has violated the ARSAC / LAWA MOU in various respects. LAWA has responded to these topics in various other responses, as noted below. Specifically:

1. Passenger Gate Limitations. Please see Topical Response TR-TMP-G-2 and Response to Comment ATMP-PC038-2.

2. Relocating West Remote Gates. Please see Topical Response TR-ATMP-G-2 and Responses to Comments ATMP-PC038-2, ATMP-PC038-41, and ATMP-PC038-44.

3. Bifurcation of gates / Multiple Apron Ramp System gates. Please see Responses to Comments ATMP-PC038-5 and ATMP-PC038-50. For general information on the ARSAC / LAWA MOU, please see Response to Comment ATMP-PC038-2.

4. Enhanced Final Approach Runway Occupancy Signal. Please see Response to Comment ATMP-PC038-3. For general information on the ARSAC / LAWA MOU, please see Response to Comment ATMP-PC038-2.

5. South Coast Air Quality Management District monitoring station. Please see Response to Comment ATMP-PC038-4. For general information on the ARSAC / LAWA MOU, please see Response to Comment ATMP-PC038-2.

6. Baseline/responses to comments. Please see Responses to Comments ATMP-PC038-6, ATMP-PC038-7, and ATMP-PC038-8. For general information on the ARSAC / LAWA MOU, please see Response to Comment ATMP-PC038-2.

ATMP-PC038-15

Comment: Since October 2018, ARSAC raised these failures to LAWA in several letters and meetings with senior LAWA Executives. As of March 10, 2021, LAWA has not provided acknowledgement of the failures or any action plan to correct them.

ARSAC has and will enforce its rights under the MOU to compel LAWA to comply with the MOU. ARSAC is willing to work with LAWA on developing MOU compliant alternatives. We look forward to your response.

Response: LAWA and ARSAC entered into the MOU in September 2016. For information concerning the MOU, and ARSAC's claims concerning LAWA's compliance with its provisions, please see Response to Comment ATMP-PC038-2.

ATMP-PC038-16

Comment: The comments and questions below are pursuant to ARSAC's right to comment on the ATMP DEIR to help LAWA be more efficient in obtaining approval for the project. ARSAC considers itself within its right to point out failures by LAWA to comply with the 2016 ARSAC-LAWA MOU, the California Environmental Quality (CEQA), the National Environmental Protection Act (NEPA), the City of Los Angeles General Plan, LAX Plan, LAX Specific Plan and all other relevant laws, regulations and industry standards.

1. ARSAC-LAWA Memorandum of Understanding
2. Preamble
3. Introduction and Executive Summary
4. Project Description
5. Project Objectives
6. Air Quality
7. Historic Resources
8. Noise
9. Projected Future Baseline Conditions
10. Cumulative Impact
11. Mitigation Measures
12. Mobility Plan 2035
13. Alternatives
14. Alternatives Considered but Rejected
15. Appendix A Notice of Preparation/Scoping
16. Appendix B Activity Forecasts and Operational Analyses
17. Transportation (main document and Appendix G)
18. Appendix H Water Supply Assessment

Response: Please see Response to Comment ATMP-PC038-1 regarding the commenter's right to submit comments on the Draft EIR and the commenter's assertion that LAWA has failed in its obligations under the MOU. The remainder of this comment is an outline of the rest of this portion of the comment letter. Please see Responses to Comments ATMP-

PC038-17 through ATMP-PC038-121 for responses to the comments associated with the subjects identified in this outline.

ATMP-PC038-17

Comment: 1. ARSAC-LAWA Memorandum of Understanding

In 2016, ARSAC and LAWA negotiated a Memorandum of Understanding (MOU) to settle ARSAC's litigation over the LAX Specific Plan Amendment Study (SPAS). The MOU put in place key commitments and parameters for the various elements of the Airfield & Terminal Modernization Project:

1. Interim North Airfield Safety Improvement Program (I-NASIP)
2. West Remote Gate Relocation Program
3. Extension of the 153 gate cap to December 31, 2024 and additional gat development controls to December 31, 2030
4. AQMD Monitoring Station.

LAWA also entered into commitments to pay for ARSAC's attendance at aviation conferences, funding for the Prop O Park on LAX Northside and lease extension of the Carl R. Nielsen Youth Park with the Westchester Playa Del Rey Youth Foundation and other commitments.

As stated before, ARSAC contends that LAWA has disregarded the provisions of the MOU in preparing the NOP and DEIR. The MOU provisions were to be the roadmap and guardrails for the ATMP. The legal questions concerning this matter are addressed in the attached letter by our attorneys, Chatten-Brown, Carstens & Minteer.

Response: With respect to the ARSAC / LAWA MOU, please see Response to Comment ATMP-PC038-2.

The comment states that the ARSAC / LAWA MOU serves as "the roadmap and guardrails for the ATMP." The ARSAC / LAWA MOU does not identify or describe the LAX Airfield and Terminal Modernization Project or contain the terms "roadmap" or "guardrails." LAWA therefore disagrees with this characterization of the MOU. LAWA has carefully reviewed ARSAC's comments concerning the MOU and has concluded that LAWA is complying with its requirements.

ATMP-PC038-18

Comment: 1. Did LAWA planning staff read the MOU? Why or why not?

Response: LAWA planning staff has read the MOU on multiple occasions and is familiar with its contents.

ATMP-PC038-19

Comment: 2. Did LAWA planning staff consider incorporating the MOU requirements into the ATMP NOP? Why or why not?

Response: Neither CEQA nor the MOU require LAWA to identify the MOU in the NOP. LAWA believes that the proposed Project is consistent with the NOP. With respect to the ARSAC / LAWA MOU generally, please see Response to Comment ATMP-PC038-2. In response to the comments stating that LAWA has violated the MOU, these comments do not raise significant environmental issues with respect to the proposed LAX Airfield and Terminal Modernization Project. LAWA believes the LAX Airfield and Terminal Modernization Project Draft EIR complies with the MOU's requirements.

ATMP-PC038-20

Comment: 3. When ARSAC asked in a meeting that LAWA invited to attend about the pre-NOP for the AMTP to reference the MOU, why did LAWA not reference the MOU into the NOP?

Response: Neither CEQA nor the MOU require LAWA to identify the MOU in the NOP. LAWA believes that the proposed Project is consistent with the NOP. With respect to the ARSAC / LAWA MOU generally, please see Response to Comment ATMP-PC038-2. In response to the comments stating that LAWA has violated the MOU, these comments do not raise significant environmental issues with respect to the proposed LAX Airfield and Terminal Modernization Project. LAWA believes the LAX Airfield and Terminal Modernization Project Draft EIR complies with the MOU's requirements. With respect to the MOU and consultation, please see Response to Comment ATMP-PC038-13. As discussed in that response, in recognition of ARSAC's interest in the proposed Project, the Final EIR includes a copy of the MOU as an attachment (see Final EIR, Attachment F1).

ATMP-PC038-21

Comment: 4. When ARSAC asked twice in writing (May 6, 2019 and July 30, 2019) to reference the MOU into the NOP for the ATMP EIR (CEQA) and ATMP EA (NEPA), why was that request not honored?

Response: Neither CEQA nor the MOU require LAWA to identify the MOU in the NOP. LAWA believes that the proposed Project is consistent with the NOP. With respect to the ARSAC / LAWA MOU generally, please see Response to Comment ATMP-PC038-2. In response to the comments stating that LAWA has violated the MOU, these comments do not raise significant environmental issues with respect to the proposed LAX Airfield and Terminal Modernization Project. LAWA believes the LAX Airfield and Terminal Modernization Project Draft EIR complies with the MOU's requirements. With respect to the MOU and consultation, please see Response to Comment ATMP-PC038-13. As discussed in that response, in recognition of ARSAC's interest in the proposed Project, the Final EIR includes a copy of the MOU as an attachment (see Final EIR, Attachment F1).

ATMP-PC038-22

Comment: 5. Did LAWA planning staff consider incorporating the MOU requirements into the ATMP DEIR? Why or why not?

Response: Neither CEQA nor the MOU require LAWA to identify the MOU in the Draft EIR. However, the Final EIR includes a copy of the MOU as an attachment (see Final EIR, Attachment F1). With respect to the ARSAC / LAWA MOU generally, please see Response to Comment ATMP-PC038-2. In response to the comments stating that LAWA has violated the MOU, these comments do not raise significant environmental issues with respect to the proposed LAX Airfield and Terminal Modernization Project. LAWA believes the LAX Airfield and Terminal Modernization Project Draft EIR complies with the MOU's requirements.

ATMP-PC038-23

Comment: 6. When ARSAC raised MOU violations with LAWA beginning in October 2020, what was LAWA's response?

Response: With respect to the ARSAC/LAWA MOU generally, please see Response to Comment ATMP-PC038-2. In response to the comments stating that LAWA has violated the MOU, these comments do not raise significant environmental issues with respect to the proposed LAX Airfield and Terminal Modernization Project. LAWA believes the LAX Airfield and Terminal Modernization Project Draft EIR complies with the MOU's requirements. With respect to the MOU and consultation, please see Response to Comment ATMP-PC038-13. As discussed in that response, in recognition of ARSAC's interest in the proposed Project, the Final EIR includes a copy of the MOU as an attachment (see Final EIR, Attachment F1).

ATMP-PC038-24

Comment: 7. Will LAWA revise the DEIR to conform to the MOU? Will LAWA create new MOU compliant alternatives?

Response: With respect to the ARSAC / LAWA MOU generally, please see Response to Comment ATMP-PC038-2. Neither CEQA nor the ARSAC / LAWA MOU requires that the EIR contain an "MOU alternative." LAWA believes the LAX Airfield and Terminal Modernization Project Draft EIR complies with the MOU's requirements.

ATMP-PC038-25

Comment: 2. Preamble

Page 3 of PDF Preamble

"Therefore, this Draft EIR was well underway prior to the COVID-19 global pandemic, which emerged in early 2020."

Comment: This illustrates LAWA had enough details to do a Draft EIR but never contacted ARSAC to consult until just prior to release of DEIR.

Response: The commenter received an electronic copy of the Notice of Preparation of an Environmental Impact Report for the proposed Project on April 4, 2019. Please see Response to Comment ATMP-PC038-13 regarding LAWA's consultation with ARSAC. As stated in that response, LAWA appropriately notified and consulted with ARSAC regarding the proposed Project. Please see Topical Response TR-ATMP-G-1 regarding the relationship between the analyses conducted for the Draft EIR and the COVID 19 pandemic.

ATMP-PC038-26

Comment: "Thus, the long-term forecasts developed for the proposed Project and documented in this Report are still valid and relevant for the long-term planning purposes of the LAX Airfield and Terminal Modernization Project environmental analyses."

Comment: Forecasts were based on unconstrained capabilities at LAX rather than what would be comfortable and practical here. If LAWA really agrees to modernization instead of expansion it will not accommodate projected growth ad infinitum and instead hold the line and help with modernization and regional distribution of aircraft operations.
U.S. Department of Transportation, Federal Aviation Administration, FAA Aerospace Forecast - Fiscal Years 2020-2040, March 2020, p. 64. Available: https://www.faa.gov/data_research/aviation/aerospace_forecasts/media/FY2020-40_FAA_Aerospace_Forecast.pdf

Response: As described in Section 2.3.1.2.1 of the Draft EIR, and documented in Appendix B.1 of the Draft EIR, both an unconstrained forecast and a constrained forecast were prepared for LAX, which is standard practice when preparing an aviation forecast. The role of the unconstrained forecast is as a starting point from which to base the constrained forecast; the constrained forecast is then developed to reflect constraints that may exist at an airport at a particular point in time. It is unclear what the commenter means in suggesting the forecast should have been based on "what would be comfortable and practical here [at LAX]." That idea is not a concept defined or recognized in professional aviation planning and analysis. Regarding the comment that LAWA should "not accommodate projected grown ad infinitum" and should instead "help with … regional distribution of aircraft operations," Section 2.3.1.2 and Appendix B.1 of the Draft EIR indicate that LAX can accommodate the future growth projected to occur by 2028, the buildout horizon year for the proposed Project, with or without the Project-related improvements. The proposed Project is not intended to accommodate growth ad infinitum. As discussed on page 4-8 of Appendix B.1 of the Draft EIR, LAWA estimates that airport operators would begin to anticipate potential effects of increasing airfield delays on their operations (and make necessary adjustments) around FY 2029, with or without the proposed Project.

Please also see Topical Response TR-ATMP-G-1 regarding the aviation demand forecast and future aviation activity at LAX, and Responses to Comments ATMP-AR002-2 and ATMP-AL007-3 regarding other regional airports in relation to LAX and the LAX Airfield and Terminal Modernization Project Draft EIR.

ATMP-PC038-27

Comment: 3. Introduction and Executive Summary

Page 31 of PDF "INTRODUCTION AND EXECUTIVE SUMMARY"
"A Notice of Preparation and Initial Study, included as Appendix A of this Draft EIR, was circulated for public review from April 4, 2019 to May 6, 2019."

Comment: ARSAC was given one way communication presentation in 2018 on this but none of our questions were addressed. LAWA stated that they did not have answers but would give them when they were available. ARSAC was never consulted on project details discussed during the NOP or post NOP periods. A presentation of the project was provided three days before the Draft EIR Release and numerous questions were not answered as well as most NOP comments addressed nor answered.

Response: Please see Response to Comment ATMP-PC038-13 regarding LAWA's consultation with ARSAC. As stated in that response, LAWA appropriately notified and consulted with ARSAC regarding the proposed Project. As the commenter does not identify the questions that they state were not previously answered, no further response is possible.

ATMP-PC038-28

Comment: Page 31 of PDF "As shown in Figure 1-1, the Project is located within the City of Los Angeles, at LAX on LAWA property. The Project is located within the LAX Plan area of the City of Los Angeles, which is in the County of Los Angeles. LAX is the primary airport for the greater Los Angeles area, encompassing approximately 3,800 acres, and is situated at the western edge of the City of Los Angeles. The proposed Project improvement sites are located within the northern and eastern portions of LAX (Figure 1-2). These sites consist of highly-developed land within and adjacent to a busy international airport. In the LAX vicinity, the community of Westchester is located to the north and the City of El Segundo is to the south, the City of Inglewood and unincorporated portions of Los Angeles County are to the east, and the Pacific Ocean lies to the west. Regional access to LAX is provided by Interstate 105 (I-105), which runs east-west and is located adjacent to LAX on the south, and the San Diego Freeway (Interstate 405 or I-405), which runs north-south and is located east of LAX. Major roadways serving LAX include Sepulveda Boulevard, Century Boulevard, Imperial Highway, and Lincoln Boulevard."

Comments and Questions:

1. Does the 3,800 acres include Manchester Square and Northside Development areas acquired for noise mitigation?

Response: The acreage of LAX cited in the Draft EIR includes Manchester Square and the Northside area. The property boundaries of LAX are illustrated in Figure 1-2.

ATMP-PC038-29

Comment: 2. Why are LA City areas within the current noise contour east of LAX not acknowledged?

Response: The text and figures on pages 1-1 through 1-4 of the Draft EIR describe the location of the proposed Project site, including the neighborhoods and jurisdictions that are immediately adjacent to LAX. The text and figures provide sufficient information about the Project location for the intended purpose. The only area within the City of Los Angeles to the east of the airport that is located within the current noise contour is South Los Angeles, which is approximately 3 miles from the airport. Figure 4.6-1 of the Draft EIR illustrates South Los Angeles and its location with respect to LAX. Figure 4.7.1-6 shows the portion of South Los Angeles that lies within the exiting LAX noise contour. Impacts within this community are acknowledged in Section 4.6 and Section 4.7.1 of the Draft EIR.

ATMP-PC038-30

Comment: 3. Why doesn't LAX equally note major roadway traffic access impacts on Vista del Mar, Pershing, Westchester Parkway, Manchester, La Tijera, La Cienega, Airport Blvd, Aviation, Florence, La Brea and many others which feed traffic into the CTA area and cargo areas?

Response: The text and figures on pages 1-1 through 1-4 of the Draft EIR describe the location of the proposed Project site and its vicinity, including the freeways and major thoroughfares that provide access to the airport. The text and figures provide sufficient information about the proposed Project location and vicinity for the intended purpose. Figure 1-2 identifies other key roadways in proximity to the airport, in addition to those identified in the text, including Vista del Mar, Pershing Drive, Westchester Parkway, La Cienega Boulevard, Airport Boulevard, Aviation Boulevard, and other roadways that provide access to the Central Terminal Area and cargo areas. Impacts related to transportation are addressed in Section 4.8, Transportation, of the Draft EIR. As discussed in that section, in accordance with CEQA, traffic effects on roadways are not considered to be impacts under CEQA. Nevertheless, the existing street system in the vicinity of LAX is described in Section 4.8.3.2.1, including the majority of the roadways identified in this comment.

ATMP-PC038-31

Comment: Page 31 of PDF " The proposed Project consists of several primary elements, including airfield improvements that would enhance operational management and safety within

the north airfield, new terminal facilities to upgrade passenger processing capabilities and enhance the passenger experience, and an improved system of roadways to better access the Central Terminal Area (CTA) and new facilities while reducing congestion."
Comment: Bluntly states expansion of capacity.

Response: The commenter is incorrect that the project overview provided in Section 1.1.1 of the Draft EIR suggests the proposed Project would expand the capacity of LAX.

As documented in Section 6.3.2 of the Draft EIR, the overall operational capacity of an airport is influenced by each key airport system component (airfield, terminal, and landside), noting that the capacity limit is set by whichever component is the most constrained. As documented in Section 4 of Appendix B.1 of the Draft EIR, LAWA's aviation experts carefully reviewed the three airport system components and determined that at LAX, the airfield is the most constraining component due to limitations of the four-runway airfield system. As the number of aircraft operations would continue to increase in the future, the limitations of the airfield component, defined in terms of the practical capacity of the airfield measured by the amount of annualized average all-weather delay (i.e., the amount of delay each flight operations would experience on an annual average all-weather basis), would start to constrain the growth in operations.

Section 3 of Appendix B.2 of the Draft EIR discusses the airfield simulations conducted by LAWA's aviation experts. As discussed in Section 3.6 of Appendix B.2 of the Draft EIR, the forecasted aircraft operations and passenger demand (and airline scheduling practices to meet such demand) would not change as a result of the proposed Project improvements, because the proposed Project airfield improvements would provide the majority of operational improvements during east flow operating conditions, which occur less than two percent of the time at LAX. See Response to Comment ATMP-AL010-205 for further discussion supporting these conclusions.

ATMP-PC038-32

Comment: Page 33 of PDF Shows Figure 1-2 is a figure of the project location details in the LAX area.

Comment: Another equally detailed map should so the areas where gates are being placed to recognize that the ARSAC MOU agreement constraints are honored.

Response: Figures 1-3, 2-4, 2-8 and 2-13 of the Draft EIR identify the proposed gate locations for Concourse 0 and Terminal 9. See Response to Comment ATMP-PC038-5 for additional information regarding the EIR's descriptions of Concourse 0 and Terminal 9. With respect to the ARSAC / LAWA MOU generally, please see Response to Comment ATMP-PC038-2.

ATMP-PC038-33

Comment: Page 34 of PDR 1.1.3 Project Objectives
"The underlying purpose of the LAX Airfield and Terminal Modernization Project is to support the ongoing modernization of LAX, to provide excellent passenger service, to support the economic growth and prosperity of the Los Angeles region, and to work closely with neighboring communities to reduce airport-related impacts. The proposed Project would support the ongoing modernization of LAX by enhancing the safety and operational management of the airfield, particularly as related to runway exits; providing a new concourse and terminal to improve the quality of the passenger experience and efficiency of passenger processing; and improving the roadway system to better route airport-related traffic away from the public roads that serve the community. These improvements would help LAX to prepare early for the continued aviation growth that is projected by LAWA, the Southern California Association of Governments (SCAG), and the Federal Aviation Administration (FAA) to occur at LAX over the next several decades. Additionally, the nature and timing of improvements included in the proposed Project are integral to Los Angeles's plans to host the 2028 Olympic and Paralympic Games, with LAX serving as the main portal for athletes, dignitaries, and visitors from around the world.

The Project objectives for the LAX Airfield and Terminal Modernization Project that support the underlying purpose are:

§Airfield Improvements - Enhance the safety and operational management of the LAX airfield while working within the limits of the existing 4-runway system (i.e., do not add or relocate runways).
Specifically, the proposed airfield improvements seek to:
¨ Enhance safety of the north airfield complex
¨ Reconfigure north airfield taxiway and runway exits and intersections to meet current FAA design standards ¨ Maintain or enhance airfield operational management
¨ Provide additional flexibility for management of aircraft movements on the airfield
§Terminal Improvements – Provide for new modern, spacious, and efficient terminal facilities that support the ability to accommodate the projected future growth in passenger levels at LAX and do so in a manner that offers high-quality passenger service and operational flexibility. For these reasons, this alternative was not carried forward for further analysis.

Comments and Questions:

1. How is LAWA reducing impacts on neighboring communities? It is certainly not working close with ARSAC.

Response: Contrary to the commenter's assertion, LAWA has been meeting with neighboring communities and community-based organizations. As of the close of the public review period for the Draft EIR, LAWA had held over 140 meetings with neighboring communities, airline and airport stakeholders, governmental agencies, and other interested parties since 2018. Of these, over 50 meetings have been with neighboring communities or community-based organizations. With respect to consultations with the commenter, please see Response to Comment ATMP-PC038-13.

ATMP-PC038-34

Comment: 2. What outreach and communication did LAWA have with the Neighborhood Council, local Business Improvement Districts and Chambers of Commerce?

Response: As of the close of the public review period for the Draft EIR, LAWA had held over 140 meetings and/or briefings with agencies, neighboring jurisdictions, and other stakeholders and interested parties concerning the proposed Project since 2018, including meetings/briefings with the Neighborhood Council of Westchester Playa, the Gateway Business Improvement District, and with ten different local Chambers of Commerce. Many of these organizations also directly received notices concerning the proposed Project. In addition, a virtual open house provided detailed information about the proposed LAX Airfield and Terminal Modernization Project and the Draft EIR analysis. LAWA also held a virtual public meeting on December 1, 2020 that provided stakeholders with a presentation on the proposed Project and the Draft EIR analysis, as well as an opportunity for questions and answers.

ATMP-PC038-35

Comment: 3. The project objective of passenger efficiency is not defined. How many passengers per gate can be handled?

Response: The commenter inquires about the definition of "the project objective of passenger efficiency."

The Draft EIR does not include a project objective of "passenger efficiency" (See Section 2.3.2.2 of the Draft EIR), and LAWA is not aware of any definition of this term.

The commenter also asks how many passengers per gate can be handled. As documented in Section 2 of Appendix B.2 of the Draft EIR, the gate layouts for 2018, 2028 No Project and 2028 With Project (i.e., proposed Project) include a wide range of gates, with various Airplane Design Group (ADG) capabilities, with contact gates or remote gates, and with various gate dependencies (i.e., when the usage of a gate depends on the size of the aircraft parked at an adjacent gate). As documented in Section 4.4.1 of Appendix B.1 of the Draft EIR, more than 60 commercial passenger airlines operated at LAX in the baseline year of 2018. Each airline operates their gates differently, with different air service characteristics and utilization and, therefore, accommodates different volumes of passengers. As documented in Section 3.2.2 of Appendix B.1 of the Draft EIR, passenger activity levels were forecasted using a socioeconomic regression analysis conducted independently from any facility constraints and, therefore, independently from how many passengers can be accommodated at each gate at LAX.

ATMP-PC038-36

Comment: 4. How many aircraft operations per runway can be handled now and will be after this project is completed

Response: The commenter inquires about the number of aircraft operations that the runway system at LAX can accommodate, both before and after the proposed Project is implemented. Based on data analyzed for calendar year 2018 (which was the baseline year of the Draft EIR technical analyses), the FAA reported the highest declared rate of 154 aircraft operations per hour (74 arrivals and 80 departures)[1]. These maximum runway acceptance rates were assumed to remain unchanged under the proposed Project scenario in 2028 because the proposed Project does not include any runway improvements (such as extending or widening the runways) that would affect maximum runway acceptance rates.

[1] U.S. Department of Transportation, Federal Aviation Administration, Aviation System Performance Metrics (ASPM), Airport Efficiency: Daily Weather By Hour Report for Calendar Year 2018, accessed January 25, 2019.

ATMP-PC038-37

Comment: 5. While we agree strongly with the safety objective, we are concerned that LAWA has not even incorporated any of the safety items promised in the ARSAC MOU. The draft talks about "projected future growth" which is not modernization but IS EXPANSION. Why wasn't the runway 24L increased from 150' to 200' wide since this is recommended (but not required) by the FAA?

Response: The commenter does not specify the safety items referred to in this comment. Please see Response to Comment ATMP-PC038-3 regarding safety-related measures included in Exhibit A of the MOU.

The commenter's opinion that projected future growth is the equivalent of expansion is noted. Please see Topical Response TR-ATMP-G-1 regarding the aviation demand forecast and future aviation activity at LAX. As explained therein, projected future growth is expected to occur with or without the proposed Project and is not the equivalent of expansion.

With regards to the commenter's question concerning the width of Runway 6R-24L, the proposed Project would not directly modify the runways at LAX. Rather, as stated in Section 2.3.2.2 of the Draft EIR, the underlying objective of the proposed Project with respect to airfield improvements is to "[e]nhance the safety and operational management of the LAX airfield while working within the limits of the existing 4-runway system." The only Project component related to Runway 6R-24L is the reconfiguration of the runway exits. Notwithstanding, it should be noted that modifying existing runways to meet Airplane Design Group (ADG) VI standards, such as for the Airbus A380, would require demolition of portions of the runway shoulder, removal and reconstruction of

full depth pavement, and relocation or expansion of runway edge lighting and other lighting systems. Such runway widening construction would require extended periods of runway closures which, in turn, would increase delays substantially at LAX and nationwide. The existing Runway 6R-24L currently accommodates ADG VI aircraft with a Modification of Standards approved by the FAA.

ATMP-PC038-38

Comment: Page 34 of PDF "Roadway System Improvements – In conjunction with providing landside (vehicle) access to the proposed new Terminal 9, develop a comprehensive network of roadway system improvements that will help separate and remove airport-related traffic from the local roadway system.
Specifically, the proposed roadway system improvements seek to:
¨ Reduce airport traffic back-ups onto public streets and surrounding neighborhoods, including, but not limited to, existing airport-related traffic congestion on Sepulveda Boulevard, especially near the entrance to the tunnel
¨ Integrate the proposed roadway system improvements, including landside access to Terminal 9, with the approved LAX Landside Access Modernization Program improvements ¨ Simplify driver wayfinding, reduce decision points, and provide more distance for maneuvering
¨ Reduce concentration of traffic and roadway facilities at and around the Century Boulevard/Sepulveda Boulevard/CTA interchange area ¨ Support access to the Intermodal Transportation Facility (ITF) West that is linked with the APM system, which will encourage use of those facilities and reduce vehicle miles traveled (VM)
¨ Develop an APM station to provide access to the future APM system for passengers and employees of the proposed Terminal 9, as well as other LAX passengers and employees (e.g., flight crews) that utilize hotel facilities nearby, which can help to reduce VMT
§ Additional Objectives
¨ Generate business development, employment opportunities, and economic activity that draws from the local workforce and benefits the communities located around LAX and the City of Los Angeles
¨ Maintain airport operations during construction
¨ Implement airport improvements in a sustainable manner that considers the total cost of ownership, including financial, environmental, and social costs
¨ Complete construction of the proposed Project prior to the 2028 Olympic and Paralympic Games to be held in Los Angeles

Comments and Questions:

1. Are all of these mitigation actions documented in the MMRP?
2. How much will be complete by the time the project is completed?
3. How will the results be measured?

Response: The excerpts from the Draft EIR that are quoted in the comment are objectives of the proposed Project presented in Section 2.3.2.2 of the Draft EIR, and are not mitigation measures to be included in the Mitigation Monitoring and Reporting Program (MMRP)

for the proposed Project. Mitigation measures for the Project that will be included in the MMRP are presented throughout Chapter 4 of the EIR.

Section 2.6.1 of the EIR, as amended by corrections and clarifications to the Draft EIR identified in Chapter 3 of this Final EIR, describes the anticipated development phasing for, and general timing of, the elements of the proposed Project.

The results of the proposed Project in terms of potential impacts resulting from the Project, which are the focus of a CEQA analysis, are presented throughout Chapter 4 and include quantitative measurements, where appropriate (i.e., air pollutant/greenhouse gas [GHG] emissions, human health risk, noise levels, energy demand, vehicle miles traveled, wastewater generation, and water demand). Project objectives are not required to be included in the MMRP, and are not subject to monitoring.

ATMP-PC038-39

Comment: 4. ARSAC requests that LAWA maintain robust VMT monitoring until the permanent closure of LAX. If LAWA counts passengers, cargo, aircraft movements on a monthly basis and annual basis, then it can count cars, light trucks, heavy trucks and buses, etc.

Response: The content of this comment is similar to comment ATMP-PC038-92; please refer to Response to Comment ATMP-PC038-92.

ATMP-PC038-40

Comment: Page 35 of PDF
"Provide connections to adjacent terminals that will allow passengers to move between terminals without having to go back through security screening"

Comments and Questions:
1. While this is a good objective how will these people be conveyed or is it expected they will walk the long distances?
2. Since we've had several security breaches in the past of people moving between terminals how will this be addressed?

Response: As described in Section 2.4.2.1 and shown on Figure 2-8 of the Draft EIR, Concourse 0 would be adjacent to, and connect directly with, Terminal 1. As such, passengers would have a very short distance to walk between Concourse 0 and the adjacent terminal.

As described in Section 2.4.2.2 and shown on Figure 2-13 of the Draft EIR, Terminal 9 would include a pedestrian walkway across Sepulveda Boulevard to connect with Terminal 8. It is anticipated that a moving walkway would be included; however, that decision and a specific design has not been determined at this point in the process. It should be noted that this is not an environmental issue and such a decision and design does not affect the Draft EIR analysis.

The planning, design, and operation of Concourse 0 and Terminal 9 would include provisions for appropriate security measures. The replacement of West Remote Gates with the new facilities at Concourse 0 and Terminal 9 would enhance the ability to consolidate and integrate security functions within those new facilities. It should be noted, similar to above, this is not an environmental issue that affects the Draft EIR.

ATMP-PC038-41

Comment: Page 34 of pdf objectives ¨" Improve passenger experience, increase airlines' efficiency, and reduce busing activity on the airfield through the removal and replacement of most of the West Remote Gates and the elimination of the associated busing of passengers"

Comments and Questions:
1. The NOP for this project talked about relocating the western remote gates in consistency with the ARSAC-LAWA MOU. ARSAC was never consulted before this was changed to removing less than all 18 gates and was only mentioned three days prior to the draft EIR release.
2. What changed and when?

Response: As explained in Response to Comment ATMP-PC038-2 above, the MOU does not require that LAWA remove all 18 West Remote Gates as part of the proposed Project, and the NOP for the proposed LAX Airfield and Terminal Modernization Project did not suggest that all 18 of the West Remote Gates would be decommissioned as part of the proposed Project. The NOP states that, in order to construct the western extension of Taxiway D, West Remote Gates and associated aircraft parking positions would have to be removed. The NOP states that those West Remote Gates that are eliminated would be replaced by new gates at Concourse 0 and Terminal 9. Figure 6 in the NOP shows the West Remote Gates that would be removed. This figure shows the West Remote Gates and related aircraft parking positions that would be displaced.

The LAX Airfield and Terminal Modernization Project Draft EIR also states that, in order to construct the western extension of Taxiway D, West Remote Gates and associated aircraft parking positions would have to be removed. Draft EIR Figure 2-26a depicts the "enabling projects" necessary to construct the extension of Taxiway D, along with other airfield improvements. Figure 2-26a in the Draft EIR shows the changes to the West Remote Gates as "enabling projects" to allow for the westerly extension of Taxiway D.

With respect to the removal of West Remote Gates as an enabling project for the westerly extension of Taxiway D, NOP Figure 6 and Draft EIR Figure 2-26a are largely identical.

Draft EIR Table 2-4 provides additional information concerning "enabling projects" – those projects that must be completed as part of the LAX Airfield and Terminal Modernization Project. Enabling Project #2, as depicted on Figure 2-26a and described in this table, states:

> Nine existing West Remote Gates would be required to be removed in order to accommodate the westerly extension of Taxiway D. In addition, an additional six West Remote Gates would be decommissioned (i.e., would no longer be used for regularly scheduled commercial flights) as part of the proposed Project, even though those six gates are not within the area required for the extension of Taxiway D. The affected remote gates would be replaced by new passenger gates at Concourse 0 and Terminal 9. (Draft EIR, Table 2-4, page 2-63; see also Draft EIR, pages 2-20, 2-38, and 2-39.)

Thus, under the proposed Project, 15 West Remote Gates would be removed or decommissioned, and three West Remote Gates would remain in operation. Draft EIR Table 2-2 at page 2-38 summarizes the net change in gates associated with the proposed Project.

The comment states that LAWA did not consult with ARSAC "before this was changed." The "change" to which this comment refers is unclear. As described above, the NOP never suggested that all 18 West Remote Gates would be removed, nor was it required to do so. Further, LAWA was not required, either by CEQA or by the MOU, to consult further with ARSAC on this issue. LAWA met its consultation obligations under CEQA. LAWA also participated in individual briefings and meetings with ARSAC, in addition to the scoping process. Given the above, it is not possible to further respond to the question "what changed and when." For additional information on LAWA's obligations to consult with ARSAC, and on consultations and briefings that have occurred with ARSAC, please see Response to Comment ATMP-PC038-13. For additional information on the status of the West Remote Gates, please see Topical Response TR-ATMP-G-2.

ATMP-PC038-42

Comment: Page 35 of pdf Project objectives "Roadway System Improvements – In conjunction with providing landside (vehicle) access to the proposed new Terminal 9, develop a comprehensive network of roadway system improvements that will help separate and remove airport-related traffic from the local roadway system.
Specifically, the proposed roadway system improvements seek to:
¨ Reduce airport traffic back-ups onto public streets and surrounding neighborhoods, including, but not limited to, existing airport-related traffic congestion on Sepulveda Boulevard, especially near the entrance to the tunnel
¨ Integrate the proposed roadway system improvements, including landside access to Terminal 9, with the approved LAX Landside Access Modernization Program improvements
¨ Simplify driver wayfinding, reduce decision points, and provide more distance for maneuvering
¨ Reduce concentration of traffic and roadway facilities at and around the Century Boulevard/Sepulveda Boulevard/CTA interchange area
¨ Support access to the Intermodal Transportation Facility (ITF) West that is linked with the APM system, which will encourage use of those facilities and reduce vehicle miles traveled (VMT)…."

Comments and Questions:
1. ARSAC was never consulted on details of the roadway improvements. When meeting with LAWA for the first time three days before release of the Draft EIR LAWA told us that details of roadways were not set and could not tell us how many lanes would be available in each roadway.
2. Since that was the case how did LAWA know how to evaluate the environmental impact from an unknown number of vehicles on each roadway?

Response: LAWA provide several briefings to ARSAC regarding the characteristic of the proposed Project and the preparation of the Draft EIR, including an overview of the conclusions of the Draft EIR that was provided to ARSAC in advance of the public release of the Draft EIR. The briefings were provide by LAWA as a courtesy to ARSAC and there is no requirement under CEQA for such briefings. LAWA indicated to ARSAC that the LAX Airfield and Terminal Modernization Project is at a conceptual level of planning and design, and details such as precise drawings of roadway improvements would be developed in conjunction with the more detailed engineering of roadway design, which is typical for any large project. The roadway design information available at the time the Draft EIR was prepared is sufficient to address the potential impacts of the proposed Project.

As indicated in Section 4.8.1 of the Draft EIR, the evaluation of transportation impacts associated with the proposed Project is based on Vehicle Miles Traveled (VMT), as required by State and local requirements for CEQA documents. VMT is calculated in terms of the number of vehicle trips multiplied by trip length. As such, the number of vehicles on individual roadways or on individual lanes within the proposed roadway system is immaterial to the Draft EIR's evaluation of transportation impacts.

ATMP-PC038-43

Comment: 3. ARSAC recommends that LAWA does not have any temporary access to Terminal 9 from northbound Sepulveda Boulevard coming out of the airfield tunnel. The tunnel routinely backs up with traffic and this proposed temporary Terminal 9 access will add to traffic congestion. The temporary access will also confuse drivers who should become accustomed to the final, proposed roadway configuration entrance by 96th Street and Sepulveda.

Response: The type of impacts described in the comment appear to be related to traffic congestion and delay. As described on page 4.8-18 of the Draft EIR, regulatory changes at the State level have resulted in the "elimination of auto delay, LOS, and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts for land use projects and plans in California." Please see Topical Response TR-ATMP-T-1 regarding CEQA transportation analysis requirements. Please also see Responses to Comments ATMP-AR002-7 and ATMP-AL007-8 for additional discussion regarding this temporary access and the fact that it would be only a temporary condition.

ATMP-PC038-44

Comment: Page 35 of pdf 1.1.4 Project Characteristics… Removal and replacement of 15 of the 18 West Remote Gates…"

Comments and Questions:
1. When was this condition changed from the NOP calling for removal and replacement of all 18 remote gates?

Response: The comment implies that the LAX Airfield and Terminal Modernization Project NOP calls for removal and replacement of all 18 West Remote Gates. As explained in Response to Comment ATMP-PC038-41, this statement is incorrect. The text of the NOP neither states nor implies that all West Remote Gates would be removed. For information concerning the ARSAC / LAWA MOU, please see Response to Comment ATMP-PC038-2. For information concerning the status of the West Remote Gates, please see Topical Response TR-ATMP-G-2.

ATMP-PC038-45

Comment: Page 36 of pdf "…In addition, the Taxiway D extension would be designed to meet Airplane Design Group (ADG) Group VI separation standards from Taxiway E and the Vehicle Service Road, allowing ADG VI aircraft to use the Taxiway D extension instead of Taxiway E to avoid operational restrictions during ADG VI arrival and departure operations on Runway 6R-24L…."

Comments and Questions:
1. Although LAWA provided an existing Airport Layout Plan of the area after release of the draft details of the taxiway changes were not available to us.
2. What width and separation is being implemented?

Response: Figure 1 on the following page illustrates the layout and separation distances associated with the Draft EIR excerpt quoted in the comment. As shown, the separation distance between Runway 6R-24L and Taxiway E (i.e., the nearest taxiway) is 450 feet; the separation distance between Taxiway E and Taxiway D is 324 feet; the distance between Taxiway D and the limits of fixed or movable objects (FOMO) is 193 feet; and the separation distance between the limits of FOMO and the vehicle service road is 25 feet.

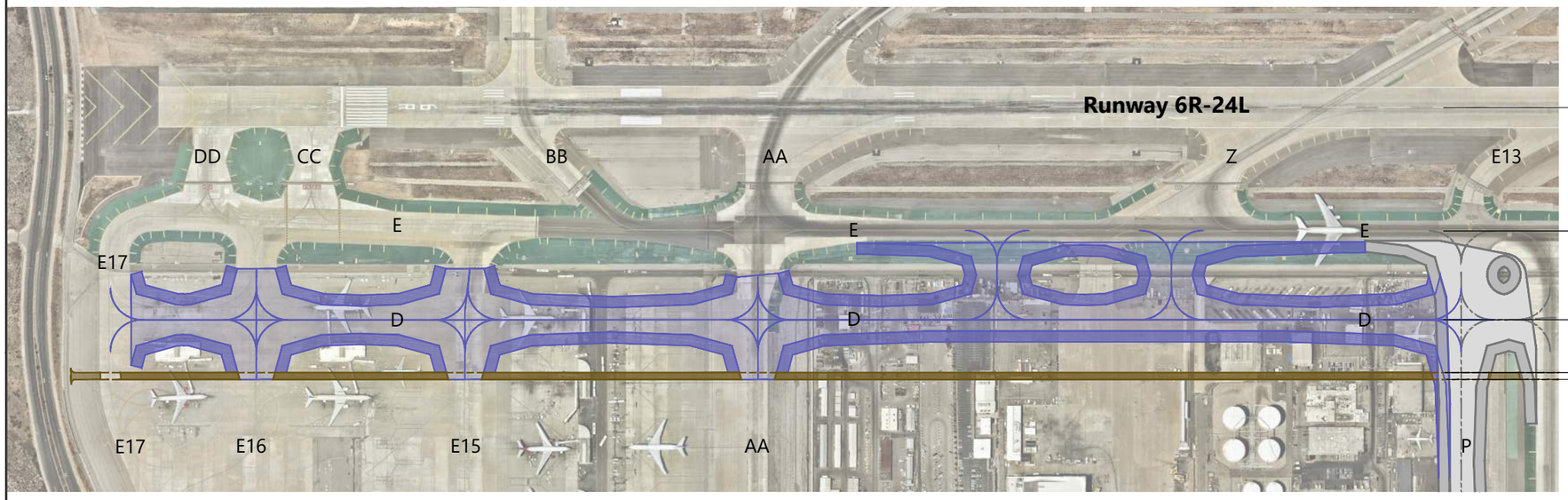
ATMP-PC038-46

Comment: Page 35 of pdf "The proposed Project includes the construction of new acute-angled exits on Runway 6L-24R that would cross Runway 6R-24L outside the high-energy zones. The improvements include two new exits for West Flow conditions (i.e., for Runway 24R when aircraft are arriving in a westward direction, which is the majority of time at LAX) and two new exits for East Flow conditions (i.e., for Runway 6L when aircraft are arriving in an eastward direction). The construction of new exits that would cross outside the high-energy zones would be accompanied by the removal or decommissioning of the

existing exits that cross the high-energy zones (i.e., existing Taxiways Y and Z). The new West Flow exits on Runway 24R would be located between Taxiways AA and the to-be-demolished Taxiway Z, and the new East Flow exits on Runway 6L would be located east and west of Taxiway W. In conjunction with the safety benefits of relocating runway exits outside of the high-energy zones, the new acute-angled exits would curve to provide crossings that are perpendicular to Runway 6R-24L, as opposed to the existing exits that cross Runway 6R-24L at an acute angle. Perpendicular crossings have safety benefits by providing pilots in arriving aircraft a better line of vision, allowing them to look down Runway 6R-24L for possible departing aircraft…."

Comments and Questions:
1. The ARSAC-LAWA MOU calls for completion of the safety elements such as Runway Status Lights (RWSL). There's no mention of this in the NOP and the DEIR is vague.
2. When is RWSL being added to the project plan and description?
3. When will RWSL be completed?

Response: Please see Response to Comment ATMP-PC038-3 regarding the RWSL component of the LAX Airfield and Terminal Modernization Project and planned RWSL activities in the north airfield. Regarding the commenter's reference to the MOU, Exhibit A, Attachment 1 of the ARSAC-LAWA MOU identifies a "potential scope" of activities intended to promote increased safety and improved aircraft operating efficiency (including installation of RWSL in the north airfield). The Attachment does not commit LAWA to any specific activity.



LEGEND
- Proposed ATMP Airfield Improvement
- Proposed Vehicle Service Road Improvement
- Approved Airfield Improvement not part of ATMP

ADG - Airplane Design Group
FOMO - Fixed or Moveable Object

Source: Ricondo & Associates, Inc., 2018.
Prepared by: CDM Smith, December 2018.

0 500 ft

LAX Airfield and Terminal Modernization Project

Taxiway D Extension West

Figure 1

ATMP-PC038-47

Comment: Page 36 of the pdf " Concourse 0 is planned as a concourse facility, with up to 11 narrow body aircraft gates that would attach to, and extend to the east of, Terminal 1. The new gates at Concourse 0, along with the new gates at Terminal 9, would serve to replace most of the existing West Remote Gates, as further described below. The two westernmost gates at Concourse 0 would replace the two easternmost existing gates at Terminal 1, resulting in a net increase of up to nine new narrow body gates.1 Concourse 0 would consist of up to seven levels, including four levels for the proposed concourse/passenger operations and potentially three additional levels of office space that LAWA is considering as an option. There would be a total floor area of up to 745,000 square feet for concourse/passenger operations, and potentially up to an additional 318,000 square feet of office space used for administrative purposes. Concourse 0 would serve both domestic and international flights. International operations would be supported with sterile2 circulation for international arrivals, a fully contained U.S. Customs and Border Protection (CBP) Federal Inspection Services (FIS) area, international baggage claim, and a sterile bus drop-off platform for passenger busing operations, if needed. Passengers arriving at or departing from Concourse 0 would process or transfer through Terminal 1 and/or the future Terminal 1.5.
3 There would be no curbside access at Concourse 0
1 Concourse 0 could accommodate up to five widebody aircraft and three narrowbody aircraft, instead of 11 narrowbody aircraft, using the same gates and passenger boarding bridges available for 11 narrowbody aircraft; however, because the primary operator at Concourse 0 is expected to be Southwest Airlines, which currently only has narrowbody aircraft in its fleet, the primary use of the subject facility is anticipated to be for narrowbody aircraft.
2 "Sterile" areas are circulation (i.e., corridors) or holding areas that are restricted to cleared passengers. Sterile areas may be secured with access control solutions that include automatic alarms, closed-circuit television (CCTV) cameras, staffed personnel, and directional signage. CBP maintains sterility to prevent mixing of cleared and uncleared passengers, as well as the potential for contraband exchange.
3 Terminal 1.5 is a facility currently under construction west of Terminal 1 and east of Terminal 2. Terminal 1.5 will include passenger and baggage screening, ticketing, and baggage claim facilities in support of existing operations within Terminals 1 and 2; a secure passenger connection (i.e., enclosed/controlled corridor) between existing Terminals 1 and 2; and office and support space.

Comments and Questions:
1. Why call for only 15 instead of 18 West Remote Gates to be closed in the MOU?
2. When did Concourse 0 change from 4 to 6 gates to up to 11 gates?

Response: For information related to the number of West Remote Gates to be removed and replaced as part of the proposed Project, please see Responses to Comments ATMP-PC038-2 and ATMP-PC038-41 and Topical Response TR-ATMP-G-2.

Regarding Concourse 0, the NOP states, "Concourse 0 is planned as an 11-gate concourse facility that would attach and extend to the east of Terminal 1." (NOP, p. 5.) This is also reflected on NOP Figure 10. This is consistent with the Draft EIR. Please see Response to

Comment ATMP-PC038-5 regarding the stability of the Project Description, including the description of Concourse 0.

ATMP-PC038-48

Comment: 3. The LAMP EIR proposed 660,000 square feet for Concourse 0. Why does the ATMP DEIR propose a dramatic size increase to over 1 million square feet?

Response: The LAX Landside Access Modernization Program EIR did not propose the development of Concourse 0. Instead, it references Concourse 0 in Table 3-1 of that EIR relative to other potential development projects at LAX that are included in the cumulative impacts analysis.[1] At the time, LAWA had not formally proposed Concourse 0, but there was sufficient potential that such a project would be proposed that LAWA concluded it was appropriate to identify Concourse 0 as a potential future project. The one sentence in the EIR that provides a description of Concourse 0 was based on very general information available in 2016 when the LAX Landside Access Modernization Program Draft EIR was prepared. That information preceded the conceptual planning that was subsequently conducted for Concourse 0 as the basis for evaluating Concourse 0 in the LAX Airfield and Terminal Modernization Project, which does propose the development of Concourse 0. The LAX Airfield and Terminal Modernization Project Draft EIR accurately describes and analyzes Concourse 0 as now proposed.

[1] City of Los Angeles, Los Angeles World Airports, Draft Environmental Impact Report for Los Angeles International Airport (LAX) Landside Access Modernization Program, (SCH 2015021014), Table 3-1, September 2016. Available: https://www.lawa.org/en/connectinglax/automated-people-mover/documents.

ATMP-PC038-49

Comment: 4. Southwest Airlines has utilized the narrow body Boeing 737 series almost exclusively in its fleet. The versatile 737 aircraft has given Southwest the ability to fly from the West Coast to the Hawaiian Islands and from the continuous United States to Mexico, Central America, and the Caribbean. Why would LAWA propose widebody gates for Concourse 0 when Southwest has not ordered or even rumored to have order widebody jets?
5. What is the likelihood that LAWA would allow other airlines to operate out of Concourse 0? The FAA requires US airports to produce "Airport Competition Plans".
6. Will Concourse 0 be open to airlines other than Southwest as a part of LAX's airport competition plan?

Response: The commenter describes the fact that Southwest Airlines has historically operated an all-Boeing 737 aircraft fleet to serve their overall network (including cities listed by the commenter). Accordingly, the commenter proceeds to inquire why LAWA is planning for widebody aircraft capabilities at Concourse 0.

As stated in Section 2.4.2.1 of the Draft EIR, it is anticipated that the primary use of Concourse 0 would be for narrowbody aircraft, such as the Boeing 737 series. It is also anticipated that Southwest Airlines would be the primary operator. Nevertheless, it is prudent and responsible for LAWA to plan for future flexibility should Southwest Airlines operate larger aircraft than the Boeing 737, or should other airlines need to operate at Concourse 0 (either temporarily or permanently), especially as LAWA seeks to reduce the reliance on remote gates to accommodate aircraft demand, as discussed in Section 2.4.2.1 of the Draft EIR. This is also consistent with the Project objective, documented in Section 1.1.3 of the Draft EIR, to provide flexibility (i.e., "flexibility for management of aircraft movements" and "operational flexibility").

The commenter further inquires about LAWA's Airport Competition Plan.
Per U.S. Code Title 49 Paragraph 47106(f)[1], no passenger facility charges or grants may be approved for a "covered" airport unless the airport has prepared and submitted a competition plan to the Secretary of Transportation. As defined under Paragraph 47106(f), a competition plan would provide information related to, among others, the availability of airport gates and related facilities, leasing and sub-leasing arrangements, and gate-use requirements. The intent is to reduce barriers to entry and enhance competitive access to airports that have a dominant air carrier(s).

Per Paragraph 47106(f), the requirement to prepare a competition plan does not apply to LAX because LAX is not considered a "covered" airport which must have one or two air carriers that control more than 50 percent of the passenger boardings, as further confirmed by the FAA's most recent list of competition plans.[2]

[1] Available: https://www.law.cornell.edu/uscode/text/49/47106.
[2] U.S. Department of Transportation, Federal Aviation Administration, Competition Plan Covered Airport List for FY 2021. Available: https://www.faa.gov/airports/aip/media/competition-plan-covered-airports-2021.pdf.

ATMP-PC038-50

Comment: P39 of pdf footnote: " Terminal 9 is proposed to include a Multiple Aircraft Ramp System (MARS) to provide LAWA with the operational flexibility to serve multiple aircraft fleet-mixes over time. The gates at Terminal 9 could accommodate up to 12 wide-body aircraft, or up to 18 narrowbody aircraft, or various combinations thereof."

Comments and Questions:
1. This is in direct conflict with MOU prohibiting bifurcation of gates.
2. Why has LAWA ignored the MOU?

Response: The comment quotes a footnote on page 2-38 of the Draft EIR that describes proposed Multiple Aircraft Ramp Systems (MARS) at Terminal 9, asserts that this is a conflict with the ARSAC / LAWA MOU and asks, "Why has LAWA ignored the MOU?" As discussed throughout these responses, LAWA has taken the MOU into consideration in planning the proposed Project and is complying with the MOU. Regarding the comment's

assertion that MARS gates at Terminal 9 represent a conflict with the MOU, the bifurcation restriction in the MOU only applies after "approval and completion" of projects in the PTMA. Proposed Terminal 9 has not been approved or completed. Thus, the bifurcation restriction does not apply. For additional information concerning the ARSAC / LAWA MOU, please see Response to Comment ATMP-PC038-2.

ATMP-PC038-51

Comment: Page 39 of pdf Table 1 as below: Table 1-1
West Remote Gates and Passenger Gates with Implementation of Concourse 0 and Terminal 9 Location Existing Conditions Future Conditions with Proposed Project Remote Gates Contact Gates Total Gates Remote Gates Contact Gates Total Gates Net Change in Gates
Source: LAWA, 2019.
Notes:
1 Passenger gates at Concourse 0 reflect net new gates. As described in Section 2.4.2.1, two of the new gates at Concourse 0 would replace two existing gates at Terminal 1 that would be removed as a result of Concourse 0.
2 As described in Section 2.4.2.1, Concourse 0 could accommodate up to 11 narrowbody aircraft or up to five widebody aircraft along with three narrowbody aircraft. As such, the number of net new gates, with the loss of two existing gates at Terminal 1, would be between six and nine.
3 As described in Section 2.4.2.2, Terminal 9 could accommodate up to 12 widebody aircraft or up to 18 narrowbody aircraft. As such, the number of new gates would be between 12 and 18….. Similar to the descriptions above of Concourse 0 and Terminal 9, the existing West Remote Gates currently can be used by a combination of narrowbody and widebody aircraft, depending on needs at the time. The accounting of gates associated with Concourse 0, Terminal 9, and the West Remote Gates depends on their utilization by aircraft type, in terms of narrowbody aircraft or widebody aircraft, which can vary over time, even during the course of the day. The gate counts presented in Table 1-1 are based on the anticipated predominant use of the gates.

Comments and Questions:
1. Alternatives exceed MOU and ignore the no bifurcation rule.

Response: The comment quotes portions of page 1-10 of the Draft EIR and states "Alternatives exceed MOU and ignore the no bifurcation rule." It is not clear to which "alternatives" the comment refers as the quoted text describes the proposed Project. Regarding the assertion that the description violates the MOU, please see Response to Comment ATMP-PC038-2. The Draft EIR clearly describes and depicts the maximum number of gates that could be accommodated at Concourse 0 and Terminal 9, providing a complete and conservative analysis.

ATMP-PC038-52

Comment: 2. Why is LAWA proposing 12 widebody or 18 narrow body gates for Terminal 9? If Terminal 9 is to be used for Star Alliance carriers, then most of the airlines are flying widebody aircraft to LAX. A narrow body aircraft gave be accommodated at a widebody gate.

Star Alliance carriers not serving LAX: Aegean Airlines (Greece), Air India, Brussels Airlines, Croatia Airlines, EgyptAir, Shenzen Airlines, South African Airways (suspended operations), TAP Air Portugal and Thai Airways. In the late 1990s and early 2000s, LAX did have flights from Air India, TAP and Thai. These flights were withdrawn due to lack of profitability.

Star Alliance carriers serving LAX, including United Airlines international services:

Airline	Origin/Destination	Aircraft	Comment
Air Canada	Vancouver, Calgary, Toronto, Montreal, Canada	Airbus A220, A320, A330; Boeing 737, 787 Dreamliner, and 777-300ER	US pre-cleared flights from Canada to US. Air Canada operates from Terminal 6.
Air China	Beijing, China PRC	Boeing 777-300ER	
Air New Zealand	Auckland, New Zealand Rarotonga, Cook Islands	Boeing 777-300ER, 787 Dreamliner	LAX-London Heathrow flight dropped in October 2020.
All Nippon Airways	Tokyo-Narita and Tokyo-Haneda, Japan	Boeing 777-300ER, Boeing 777-200ER	
Asiana Airlines	Seoul, Republic of Korea (South)	Airbus A380, A350XWB	Korean Air announced acquisition of Asiana in November 2020. Asiana brand to be discontinued.
Austrian Airlines	Vienna, Austria	Boeing 777-200ER	Seasonal service from Terminal 6.
Avianca Airlines	Bogota, Colombia	Boeing 787	
Avianca Costa Rica	San José, Costa Rica	Airbus A320 series	Star Alliance Affiliate; formerly LACSA

Airline	Origin/Destination	Aircraft	Comment
Avianca El Salvador	San Salvador, El Salvador	Airbus A320 series	Star Alliance Affiliate; formerly TACA
Copa Airlines	Panama City, Panama	Boeing 737 series	Operates late at night at LAX (between 11:00pm and midnight)
Ethiopian Airlines	Addis Abba, Ethiopia Lomé, Togo	Boeing 787	
EVA Air	Taipei, Republic of China (Taiwan)	Boeing 777-300ER	
LOT Polish Airlines	Warsaw, Poland	Boeing 787	
Lufthansa	Frankfurt and Munich, Germany	Airbus A380, A350; Boeing 747-400 and 747-8	A380's currently parked due to COVID-19 pandemic may be phased out of fleet.
Scandinavian Airlines	Copenhagen, Denmark	Airbus A350	Also known as "SAS". SAS pioneered the Polar Route from LAX to Europe in 1954.
Singapore Airlines	Singapore Tokyo-Narita, Japan	Airbus A350-900 ULR, Boeing 777-300ER	The A350-900 ULR is used on the LAX-SIN non-stop, the second longest non-stop route in the world.
Swiss International Airlines	Zurich, Switzerland	Boeing 777-300ER	
Turkish Airlines	Istanbul, Turkey	Boeing 777-300ER	
United Airlines	Various	Airbus A320, A321XLR and Boeing 737, 757, 767, 777, 787	Airbus A350 orders deferred to 2027.

Response: As documented in Section 2.4.2.2 of the Draft EIR, it is anticipated that the primary use of Terminal 9 would be for widebody aircraft operations, considering Terminal 9 airlines would primarily accommodate international flights. However, as discussed in Section 1.1.3 of the Draft EIR, a proposed Project objective is to provide flexibility (i.e., "flexibility for management of aircraft movements" and "operational flexibility"). Thus, for disclosure purposes, the Draft EIR documented the ability of Terminal 9 to also accommodate narrowbody aircraft. As noted by the commenter, a number of STAR Alliance airline partners do operate narrowbody aircraft (including United Airlines, Air Canada, Avianca, and Copa Airlines). Flexibility to accommodate these airlines is precisely why narrowbody capabilities are planned at Terminal 9.

As noted in Footnote 17 in Section 2.4.2.3 of the Draft EIR, Terminal 9 is proposed to include a Multiple Aircraft Ramp System (MARS) to provide operational flexibility. Such flexibility may be required during peak times. For example, an airline might schedule two narrowbody aircraft instead of one widebody aircraft because the scheduled widebody aircraft experienced mechanical issues, or because the airlines made schedule adjustments during peak times.

ATMP-PC038-53

Comment: Page 40 of pdf section 1.2 "Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts."

Comments and Questions:
1. Where are the disagreements about project listed? This could include differences in the project definition as well but no such summary exists.
2. LAWA indicates it's in Chapter 1 of EIR ??! Where is it?

Response: The commenter quotes Section 15151 of the State CEQA Guidelines regarding "disagreement among experts." The Draft EIR does not indicate, as the commenter states, that Chapter 1 includes a summary of the main points of disagreement among experts. At the time the Draft EIR was published, LAWA was not aware of any disagreements among experts related to the proposed Project. The Final EIR addresses the main points of disagreement, in compliance with Section 15151 of the State CEQA Guidelines, based on comments submitted on the Draft EIR. Additionally, in compliance with Section 15123(b)(2) of the State CEQA Guidelines, Section 1.6 of the Draft EIR discusses areas of known controversy and issues to be resolved. The focus of this discussion is on environmental concerns.

Regarding the main points of disagreement that were identified in comments received on the Draft EIR, which can also be considered areas of controversy, Section 1.6 of the Draft EIR has been revised to include the following points – Please see Chapter F3, Corrections and Clarifications to the Draft EIR:

Areas of Controversy Identified in Comments on the Draft EIR

- COVID-19 Pandemic's Effects – Comments were received asserting that the effects of the COVID-19 pandemic should be accounted for in the Draft EIR relative to whether the feasibility and utility of the proposed Project are still valid.
- Impacts Beyond the Horizon Year of 2028 – Comments were received asserting that the impacts analyses that addressed operational impacts in 2028, which is the proposed buildout (i.e., completion) year for the Project, should have evaluated impacts farther into the future, including as far as the year 2045.
- Growth Inducement – Comments were received asserting that the improvements associated with the proposed Project, particularly the new terminal facilities (i.e., Concourse 0 and Terminal 9) and the associated new gates for aircraft, would induce additional activity at LAX (i.e., more aircraft flights and more passengers) than would otherwise occur without those improvements.
- Aircraft Gates – Comments were received asserting that the Draft EIR's assumptions regarding the availability of existing aircraft gates in the future were inaccurate, particularly as related to the future decommissioning of West Remote Gates.

- Transportation Impacts – Comments were received asserting that the Draft EIR should have addressed future traffic congestion around LAX and resultant decreases in the roadway/intersection level of service (i.e., "LOS") and increases in travel delay.
- Air Quality and Greenhouse Gas (GHG) Emissions – Comments were received asserting that the impacts analyses related to air quality and GHG were incomplete and/or inaccurate, and that the proposed mitigation measures were incomplete or inadequate.
- Noise – Comments were received asserting that the impacts analyses related to aircraft noise (particularly with regard to impacts associated with temporary runway closures), construction noise, and roadway noise, were incomplete and/or inaccurate, and that mitigation measures proposed for aircraft noise impacts and construction noise impacts were incomplete or inadequate.
- Alternatives – Comments were received asserting that the Draft EIR did not address a reasonable range of alternatives, and disagreeing with the Draft EIR's identification of the environmentally superior alternative.

All comments received regarding the above issues have been addressed in the Final EIR. Please see Chapter F2, Responses to Comments on the Draft EIR.

ATMP-PC038-54

Comment: Regarding page 1-22 Table 1-2 Summary of potential Impacts and mitigations Transportation States less than significant and no mitigations.

Comments and Questions:
We estimate that during this period at least 100,000 additional aircraft flights will occur into LAX based on LAWA and FAA projections without a true regionalization program in Southern California. We agree that the pollution from the aircraft can't be mitigated per se but the attendant ground traffic of 30 MAP should be significant in many ways—congestion for one, but also air quality impacts. ADDING 30 million annual passengers is like adding another significant sized airport at LAX- New York LaGuardia Airport (30 MAP in 2019)! There MUST be mitigations—not just in the CTA but in the areas of increased traffic originating as much as 10-30 miles for people going to-from LAX.

Response: The commenter correctly notes that the portion of Table 1-2 on page 1-22 of the Draft EIR states that the proposed Project would [not conflict with a plan, program, ordinance, or policy addressing the circulation system that would result in a significant impact] and that no mitigation is required. Potential transportation impacts of the proposed Project were assessed against five different thresholds. The comment does not acknowledge that the determination of less than significant impact was made for two of the transportation thresholds (Threshold 4.8-1 and Threshold 4.8-5) and that significant impacts were identified for the proposed Project for Thresholds 4.8-2, 4.8-3, and 4.8-4. This is shown on pages 1-22 and 1-23 of the Draft EIR.

The comment does not provide evidence to support the estimates of 100,000 additional flights into LAX and an additional 30 million annual passengers (MAP). The future growth

projections presented in Appendix B.1 of the Draft EIR, which are supported by substantial evidence cited therein, indicate annual aircraft activity levels will increase from 715,000 in 2018 to 800,00 in 2028, which is the horizon build-out year for the proposed Project, and passenger activity during that period will increase from 86.1 MAP to 110.8 MAP (see Tables 3-8 and 4-1 in Appendix B.1). As such, the projected increases are 85,000 annual aircraft operations and 24.7 MAP. It should be noted that those activity levels at LAX are projected to be the same with or without the proposed Project, as indicated in Section 2.3.1.2 of the Draft EIR and substantiated in Appendix B.1.

The analysis of transportation impacts presented in the Draft EIR accounts for additional motor vehicle trips associated with the projected increases in passenger levels at LAX, and concludes that the passenger-related vehicle miles traveled (VMT) impacts can be partially mitigated, but there would be an unavoidable significant impact relative to passenger VMT – see Section 4.8.5.3.3 of the Draft EIR.

The commenter states that mitigation measures should be identified that address transportation impacts that occur far beyond the Central Terminal Area. The Draft EIR identifies mitigation measures that would address impacts outside the Central Terminal Area. The transportation impact mitigation measures presented in Section 4.8.5.2.2 of the Draft EIR are based on VMT. As the Draft EIR explains, VMT is calculated by estimating both the number and length of trips. (Section 4.8.2.2 of the Draft EIR) This approach takes into account the entire length of airport-related trips. As shown in Figure 4.8-4 of the Draft EIR, the passenger-related VMT analysis area was regional in nature, extending well beyond the 10-30 miles suggested by the commenter.

Regarding the commenter's reference to traffic congestion associated with the future growth being a significant impact, congestion as measured by intersection level of service, delay, or other such metrics is no longer considered to be a significant impact under CEQA. Please see Section 4.8.3.1.1 of the Draft EIR and Topical Response TR-ATMP-T-1 regarding CEQA transportation analysis requirements.

With regard to air quality impacts associated with the proposed Project, including those related to motor vehicles, such impacts are addressed in Section 4.1 of the Draft EIR. While Section 4.1.1.5.2.2 of the Draft EIR includes mitigation measures for operations-related air quality impacts, it should be noted that the VMT mitigation measures presented in Section 4.8.5.2.2 also serve to mitigate motor vehicle air quality impacts.

ATMP-PC038-55

Comment: 4. Project Description

The Project Description appears to be unstable. The legal questions concerning this matter are addressed in the attached letter by our attorneys, Chatten-Brown, Carstens & Minteer.

Response: This comment refers to a letter from Chatten-Brown, Carstens & Minteer and, specifically, to what has been designated as comment ATMP-PC038-5; please see Response to Comment ATMP-PC038-5 for a response to the commenter's concerns.

ATMP-PC038-56

Comment: Page 42 of EIR 1.3 Outline "Chapter 2 – Description of the Proposed Project". Chapter 2 presents the location of the proposed Project, the objectives of the proposed Project, and a description of the elements, enabling projects, and construction schedule of the proposed Project. In addition, Chapter 2 identifies the intended use of the EIR and the approvals required for implementation of the proposed Project."

Comments and Questions:
1. No single project description exists and it is never clear throughout the EIR. How many gates is it due to the MARS gate configuration?
2. What is LAX passenger capacity with the various proposed gate configurations?

Response: Contrary to the commenter's assertion in Question 1, a clear, single project description is provided in Chapter 2 of the Draft EIR. The number of gates is described in Section 2.4.2, with a detailed accounting of the number of gates with implementation of the proposed Project provided in Table 2-2. Please see Response to Comment ATMP-PC038-5 for additional responsive information.

With respect to the commenter's Question 2 concerning "passenger capacity," the proposed Project description does not include "various proposed gate configurations" as the commenter asserts. Rather, as described in Section 2.4.2 of the Draft EIR, Concourse 0 and Terminal 9 would provide the ability to accommodate a specific number of narrowbody and/or widebody aircraft to ensure operational flexibility, utilizing Multiple Aircraft Ramp System (MARS) technology, within the same proposed terminal linear frontage at Concourse 0 and Terminal 9. This operational flexibility, which also exists at various other terminals at LAX, was assumed in the technical analyses documented in Appendix B.2 of the Draft EIR. Please see Response to Comment ATMP-PC038-5 for additional responsive information. Also see Response to Comment ATMP-PC038-35 for a discussion regarding the many factors that would influence the number of passengers that could be accommodated at each gate at LAX.

The comment appears to be based on the premise that a project description must be rigid and fixed, and that a project description cannot afford a degree of operational flexibility. There is no support for this premise. If such a premise were to exist, it would mean that an agency would be unable to incorporate a degree of flexibility into a design of a proposed project. Such flexibility does not mean that a project description is vague or opaque. Rather, it means that a degree of operational flexibility is built into the project as a matter of design. Such operational flexibility is a commonplace feature of public projects such as the proposed Project.

ATMP-PC038-57

Comment: ARSAC is concerned that the ATMP fails to include all possible airfield safety measures. ARSAC advocated for and LAWA implemented enhanced signage, runway and taxiway markings and improved lighting. It was through ARSAC's advocacy that the FAA approved the installation of Runway Status Lights (RWSL) at LAX. RWSL provides pilots a visual warning if it is safe to enter a runway. This low cost, high safety value technology has significantly reduced runway incursions at LAX. ARSAC had requested in the MOU and in many communications to LAWA that the Enhanced Final Approach Runway Occupancy Signal (eFAROS) be included in ATMP. It was not. Furthermore, ARSAC continues to advocate for a fully staffed air traffic control tower at LAX. ARSAC requests that LAWA lobby the FAA to provide adequate tower staffing so that controllers are not routinely working 6 days a week and overtime on a regular basis (pre-COVID-19).

Response: Please see Response to Comment ATMP-PC038-3 regarding the RWSL component of the LAX Airfield and Terminal Modernization Project and planned RWSL activities in the north airfield, eFAROS, and air traffic control tower staffing.

ATMP-PC038-58

Comment: Comments and Questions:
1. Why does the ATMP DEIR not relocate all 18 of the West Remote Gates to the Passenger Terminal Modernization Area (PMTA)? Reference MOU Page 2 Whereas clauses and Exhibit A, Section II, Paragraph B. LAWA's long term planning goal has been to remove the West Remote Gates. This commitment goes back to the approval of the LAX Master Plan Alternative D in 2004 and the FAA's Record of Decision of May 2005 that supports the relocation of the West Remote Gates, "Further, the remote gates on the west pad will be eliminated and this area will be prohibited from use as a remote passenger boarding location. See page 3-75 in Chapter 3 of Part I of the Final EIS."

https://www.faa.gov/airports/environmental/records_decision/lax/media/rod_los_angeles.pdf

2. When will LAWA relocate all 18 West Remote Gates to the PMTA?

Response: The comment asks why the proposed Project does not include removal and relocation of all 18 West Remote Gates. As set forth in the Draft EIR:

- Nine West Remote Gates must be removed in order to accommodate the westerly extension of Taxiway D.
- Six West Remote Gates would be decommissioned and would not be used for regularly scheduled passenger service once Concourse 0 and Terminal 9 are operational.
- Three West Remote Gates would be retained and remain in operation.

- The 15 gates to be removed at the West Remote Gates would be replaced and relocated to Concourse 0 and Terminal 9. Taken as a whole, there would be a net increase of between 3 and 12 gates (the range depends on whether the gates at Concourse 0 and Terminal 9 are used for widebody or narrowbody aircraft). (See Draft EIR, Table 2-2, p. 2-38.)

The EIR, therefore, provides the information requested by the comment. For additional information on the West Remote Gates and the ARSAC / LAWA MOU, please see Topical Response TR-ATMP-G-2 and Responses to Comments ATMP-PC038-2, ATMP-PC038-41, and ATMP-PC038-44.

ATMP-PC038-59

Comment: 3. LAWA claims it needs to retain West Remote Gates for operationally efficiency and for Very Very Important VIP's (i.e. Air Force One). Isn't the purpose of eliminating the West Remote Gates because they are NOT efficient for passengers and the airlines? There are at least half a dozen other locations on the LAX airfield that could support the security needs of VVIP flights- why is LAWA not considering other locations?

4. ARSAC witnessed an Air Force Presidential fleet aircraft parked north of West Remote Gate 409 during a gate verification tour on February 24, 2021. When Air Force One or Air Force Two arrives at LAX, they are parked north of Gate 408 or 409 facing WEST. Presidential flights are serviced with stair trucks, not passenger boarding bridges. LAWA is proposing retaining Gates 410, 412 and 414 for "operational flexibility" and VVIP flights such as the President of the United States. These three gates have passenger boarding bridges and the aircraft face EAST. Did LAWA consult with the Secret Service on this proposal? The Secret Service requires a defensible perimeter and easy access to the runway in case that the President or Vice President of the United States needs to depart immediately.

Response: As explained in Section 2.4.2.3 of the LAX Airfield and Terminal Modernization Project Draft EIR, and clarified in Chapter F3, Corrections and Clarifications to the Draft EIR, three remaining WRGs would remain in operation following implementation of the proposed Project in 2028 just as they are used under baseline conditions. As illustrated in Exhibit 2-3 of Appendix B.2 of the Draft EIR, gates 410, 412, and 414 would be retained with implementation of the proposed Project.

ATMP-PC038-60

Comment: 5. Is the replacement of the West Remote Gates on a 1-to-1 basis into the PTMA as contemplated during the negotiation and approval of the MOU?

Response: The comment asks whether replacement of the West Remote Gates on a one-to-one basis into the PTMA would occur "as contemplated during the negotiation and approval of the MOU." The proposed net change in gates is shown at Table 2-2 at page 2-38 of the Draft EIR. The proposed Project would result in a net increase of between three and

12 gates. The MOU does not require a one-to-one replacement of West Remote Gates with gates within the PTMA. For additional information on the West Remote Gates and the ARSAC / LAWA MOU, please see Topical Response TR-ATMP-G-2 and Responses to Comments ATMP-PC038-2, ATMP-PC038-41, and ATMP-PC038-44.

ATMP-PC038-61

Comment: 6. The MOU specifically prohibits bifurcation of gates or double-parking of aircraft at passenger gates until December 31, 2030. Why did LAWA propose Multi Apron Ramp System (MARS) gates for Concourse 0 and Terminal 9 when the MOU specifically prohibits MARS gates as a form of bifurcation/double parking? Reference MOU Exhibit A, Section II, Paragraph C, Sentence 2 and Paragraph D.

Response: The comment states that LAWA has violated the MOU due to proposed bifurcation of gates and MARS gates. These alleged violations of the MOU are addressed in Responses to Comments ATMP-PC038-2, ATMP-PC038-50, and ATMP-PC038-51. No further response is required under CEQA as the comment does not raise significant environmental issues.

ATMP-PC038-62

Comment: 7. Why is the removal of Taxiway E-17 not included in the ATMP? The removal of Taxiway E-17 is noted in MOU Exhibit A, Attachment 1, "Interim North Airfield Safety Improvement Project (I-NASIP) Potential Scope" and is noted on the LAX Airport Layout Plan dated January 17, 2020 that LAWA had supplied to ARSAC this year.

Response: The proposed Project does not include the elimination of any taxiways. The proposed Project includes taxiway extensions of Taxiway C in the south airfield and of Taxiway D and Taxiway E in the north airfield. Attachment 1 of Exhibit A of the MOU identifies components of a previous iteration of the modifications to taxiways and runways in the north airfield, referred to as the Interim North Airfield Safety Improvement Project, or I-NASIP. The attachment states that the project "may include" the components listed in the attachment. The removal of Taxiway E-17 is one of these listed components. As evidenced by the Draft EIR, the elimination of Taxiway E-17 is not part of the proposed Project because no taxiways are proposed to be eliminated. There are several other I-NASIP components listed in Attachment 1 that are not elements of the proposed Project.

ATMP-PC038-63

Comment: 8. Will the ATMP include a complete installation of Runway Status Lights on the LAX North Airfield? This is not clearly stated in the ATMP. When LAWA gave ARSAC a preview briefing of the ATMP DEIR on October 26, 2020, neither LAWA Chief Commercial Officer Samantha Bricker nor CDM Smith Consultant Tony Skidmore could answer this question. LAWA promised to provide an answer, but to date ARSAC has not received an answer.

The MOU Exhibit A, Attachment 1 has "Complete the installation of Runway Status Lights (RWSL) on the North Airfield" listed.
9. Why is the installation of Final Approach Runway Occupancy Signal (FAROS) not included in the AMTP? FAROS is listed in the MOU Exhibit A, Attachment 1.

Response: Please see Response to Comment ATMP-PC038-3 regarding the RWSL component of the LAX Airfield and Terminal Modernization Project and planned RWSL activities in the north airfield and Response to Comment ATMP-PC038-46 regarding the potential scope of activities identified in the ARSAC-LAWA MOU, Exhibit A, Attachment 1.

ATMP-PC038-64

Comment: 5. Project Objectives (2.3.2)

Page 35 of PDF
"Provide connections to adjacent terminals that will allow passengers to move between terminals without having to go back through security screening"

Comments and Questions:
1. While this is a good objective how will these people be conveyed or is it expected they will walk the long distances?
2. Since we've had several security breaches in the past of people moving between terminals how will this the addressed? Is there a security plan in place to shut down other connections in case of a breach?

Response: The content of this comment is substantively the same as comment ATMP-PC038-40; please refer to Response to Comment ATMP-PC038-40.

ATMP-PC038-65

Comment: Additional Comments and Questions:
1. In DEIR Section 2.3.2.2, LAWA makes a goal of "Improve customs and immigration processes for international passengers at LAX." Since the 1980's the federal government has utilized overtime to make up for shortfall in Customs and Immigration staffing. Just because LAWA builds Federal Inspection Service (FIS) facilities does not mean that Customs and Border Control, Agriculture and Fish & Wildlife will show up. What commitments does LAWA have from these Federal agencies to provide adequate staffing for the existing FIS facilities at LAX (e.g. TBIT, Terminals 2, 4, 5 and 7) and the new, proposed ones at Concourse 0 and Terminal 9?

Response: The development of Federal Inspection Services (FIS) facilities is included as part of Concourse 0 and Terminal 9. While development of those FIS facilities is within the scope of the proposed Project and within the control of LAWA, the staffing of those facilities is outside the scope of the proposed Project and is not within LAWA's authority. LAWA coordinates closely on an ongoing basis with the various federal agencies, such as the U.S. Department of Homeland Security, including Customs and Border Control

Protection and the Transportation Security Administration, regarding existing and anticipated staffing needs at LAX; the provision of such staffing is ultimately the responsibility of the federal government.

ATMP-PC038-66

Comment: 2. LAWA wants to have the LAX improvements completed prior to the 2028 Los Angeles Olympic and Paralympic Games. Has LAWA coordinated or offer to coordinate with the LA 2028 Olympic Committee to promote more than just LAX as the gateway to the Los Angeles region for the 2028 Olympics?
3. In preparing for the 2028 Olympics, did LAWA consider other airports such as the 17,750 acres of land in Palmdale to create additional airport capacity for the Olympics?

Response: LAWA is on the Mobility Committee for the 2028 Olympic and Paralympic Games. LAWA controls only LAX and Van Nuys General Aviation airport. The operation and use of Palmdale Regional Airport is within the jurisdiction of the City of Palmdale – Palmdale Airport Authority. For a discussion of the anticipated growth at other airports in the region, please see Section 2.3.1.2 of the Draft EIR. Based on the information presented in that section, which summarizes the regional aviation demand growth projections developed by the Southern California Association of Governments, other airports are expected to serve an increased share of passenger demand in the Los Angeles region in the coming years. Nonetheless, LAX is projected to continue to serve a substantial percentage of this overall demand. That is particularly true for international flights, such as those that are expected to occur in connection with the 2028 Olympic and Paralympic Games.

ATMP-PC038-67

Comment: 6. Air Quality (4.2)

Regarding air quality in Chapter 4 (page 4-3) Projected Future Conditions Baselines.

Comments and Questions: This topic is covered in the letter from our attorney. The notion that there will be runway closures impacting current years so that LAWA wants to use 2023 and 2024 because the traffic is less representative fails a reasonableness test. No one, including LAWA, can say with any certainty that there won't be ground air traffic delays and issues in the new period so the "real" baseline (which won't have as much air traffic recovery) is a more reasonable basis to compare to future for the baseline.

Response: The content of this comment is similar to, and references, comment ATMP-PC038-6; please refer to Response to Comment ATMP-PC038-6.

ATMP-PC038-68

Comment: Regarding Page 4.1.1.-5 Section 4.1.1.1.2.2. Air Quality --Scope of Analysis, operations Along with 3.3.1 Air Quality (page 3-2) plus all of Appendix C

Comments and Questions: This analysis is not comprehendible by normal people. It shows objectives and then in the appendix is a list of hundreds of pages listing inputs to a model. Where in all of this information is the increase of vehicle pollution from the at least 30-50% increase in vehicles? From within ATMP Appendix C3 table there's about 100 pages of inputs with traffic link columns for cars, trucks, etc. Within the hundred or more pages there is not a single light truck (i.e. SUV, PT Cruiser, etc.) in the mix?

Response: Section 4.1.1 of the Draft EIR summarizes and explains the technical data included in Appendix C of the Draft EIR in plain language that provides meaningful information to the public and the decision-makers, as required by CEQA. As shown in the "Traffic & Parking" row under "Incremental Changes" in Table 4.1.1-10 on page 4.1.1-45 in Section 4.1.1 of the Draft EIR, vehicle-related emissions of gaseous pollutants (carbon monoxide, volatile organic compounds, nitrogen oxides, and sulfur oxides) would decrease after implementation of the proposed Project when compared to existing conditions in 2018. As described on page 4.1.1-44 in Section 4.1.1 of the Draft EIR, "engine exhaust emission factors (emission rates in grams per mile) decrease as older vehicles are replaced with new ones that comply with cleaner emission standards." Therefore, while the vehicle miles traveled (VMT) would increase due to regional growth unrelated to proposed Project, as well as to increases in passenger levels and proposed Project-related employment, the decrease in vehicle emission factors would be sufficient to offset the increased number of cars and trucks traveling to LAX. However, fugitive dust emissions that would occur from paved road dust, tire wear, and brake wear would not change with time and are related solely to VMT. Therefore, particulate matter emissions would increase after implementation of the proposed Project, as shown in Table 4.1.1-10 on page 4.1.1-45 of the Draft EIR. While not used to determine the significance of proposed Project impacts, Table 4.1.1-11 on pages 4.1.1-46 and 4.1.1-47 of the Draft EIR compares emissions in 2028 With Project implementation to 2028 emissions without the proposed Project. The "Traffic & Parking" row under "Incremental Changes" shows that all pollutant emissions would increase under this scenario, reflecting the change in VMT only.

Air dispersion modeling was completed to evaluate if increased emissions from all sources (not just traffic and parking) would cause the state or federal ambient air quality standards to be exceeded. As shown in Table 4.1.1-14 on page 4.1.1-52 of the Draft EIR, PM10 operational concentrations would exceed the significance threshold, thereby indicating a significant impact. As discussed on page 4.1.1-58 of the Draft EIR, proposed mitigation measures would not be sufficient to reduce PM10 concentrations to a level that is less than significant; therefore, proposed Project-related operational concentrations would be significant and unavoidable.

The "light-duty truck" category shown in Appendix C of the Draft EIR is actually for "light-heavy-duty" trucks (8,500 to 14,000 pounds gross vehicle weight) as categorized by the California Air Resources Board (CARB). The vehicles described in the comment (e.g., sports-utility vehicles) are included in the source category "cars" (which is the CARB

source categories for light-duty automobiles, light-duty trucks, and medium-duty trucks [gross vehicle weight less than 8,500 pounds]) and are not missing from the traffic and emissions analyses. The traffic data files included in Appendix C3 were used to create inputs to air dispersion modeling and were not used to calculate regional traffic disclosed in the Draft EIR. Appendix C of the Draft EIR has been revised to include traffic data for calculations that were used when determining significance. Please see Chapter F3, Corrections and Clarifications to the Draft EIR. Inclusion of this data merely clarifies and amplifies information already included in the Draft EIR and does not amount to significant new information that would require recirculation of the Draft EIR.

LAWA has made every effort to present this information in a fashion that is understandable and accessible. LAWA recognizes that the modeling performed to conduct this analysis is technical in nature. These models are, however, in wide use to support CEQA analyses of this sort. Some commenters are interested in these technical details, as evidenced by the comments received on the Draft EIR. The EIR must, therefore, balance the need for accessibility to the public and decision-makers, with the desire of some commenters for technical detail. For this reason, Section 4.1.1 of the Draft EIR provides a description of the analysis that was performed and presents the results, while additional technical details, including modeling assumptions and results, are presented in Appendix C.

ATMP-PC038-69

Comment: 7. Cultural Resources (Historic Resources)

Comments and Questions:
1. The history of LAX on page 17 of Appendix D is missing that the City of Los Angeles acquired the Bennett Ranch land on October 1, 1937. There is a plaque commemorating this event on the ground floor of the Theme Building.

Response: The date that the City of Los Angeles acquired the Bennett Ranch is noted. This information does not alter the conclusions of the analysis of historical resources provided in the Draft EIR; therefore, no further response is required.

ATMP-PC038-70

Comment: 2. ARSAC appreciates that the four historic eligible buildings identified in the report will not be affected by the Project, especially the 1961 Air Traffic Control Tower which should be restored, the Union Savings and Loan Building and the Aircraft School Building.

Response: This comment is noted. As the comment states, the proposed Project would not have an adverse direct or indirect effect on the three historic resources cited in the comment. The resources would not be physically altered, nor would their context change, such that the characteristics that make these resources historic would be materially diminished. Whether or when to restore the 1961 Air Traffic Control Tower is not part of the proposed Project. The proposed Project would neither help nor hinder the restoration

of the 1961 Air Traffic Control Tower, should there be a desire to propose such restoration at some point in the future. For additional information on historic resources, including the resources cited in the comment, please see Appendix D of the Draft EIR. The comment will be included in the Final EIR for consideration by the decision-makers prior to taking any action on the LAX Airfield and Terminal Modernization Project.

ATMP-PC038-71

Comment: 8. Noise (4.7)

Comments and Questions:
1. Not all of the eligible homes in the 65dB or higher contour in Westchester/Playa del Rey participated in the Residential Soundproofing Program between 1997 and 2014. Some of these homes have changed ownership. Will these non-participating homes be included in a reopened Residential Soundproofing Program for Westchester/Playa del Rey. Will this happen? What is required to make this happen?

Response: LAX sound insulation programs are described on pages 4.7.1-25 and 4.7.1-26 in Section 4.7.1.3.1.3 of the Draft EIR. Section 4.7.1.5.1.3 of the Draft EIR discusses mitigation measures for aircraft noise impacts. As explained, mitigation of aircraft noise exposure impacts occurs through sound attenuation of eligible structures, as accomplished through the City of Los Angeles Residential Soundproofing Program or Residential Sound Insulation Programs of surrounding jurisdictions and school districts.

As discussed on page 4.7.1-25 of the Draft EIR, in 1997, LAWA, working closely with local Council offices, implemented a voluntary Residential Soundproofing Program (RSP) for aircraft noise-impacted communities in the City of Los Angeles near LAX. The City of Los Angeles Soundproofing Program at LAX offered sound insulation to residential building owners in areas of the City of Los Angeles that were in the 65 dB CNEL noise contour shown on the fourth quarter of 1992 (4Q92) noise contour map. The Soundproofing Program began in 1997 with the implementation of sound insulation projects within the highest noise-impacted areas of Westchester, Playa Del Rey, and South Los Angeles. After an extensive outreach effort to contact all eligible homeowners, LAWA issued the final program participation deadline of June 1, 2010, and closed out the program in 2014. At program completion, LAWA had soundproofed over 7,300 residential dwelling units in the City of Los Angeles near LAX. Homeowners have contacted LAWA about reinstating the program in the City of Los Angeles for eligible homeowners who did not participate in the sound insulation program previously. Recently, LAWA has taken steps to reinstate a “second chance” program for eligible homeowners.

Separately, LAWA established the Sound Insulation Grant Program to administer and monitor funding (airport and federal funds) for Residential Sound Insulation Programs implemented by the City of Inglewood, County of Los Angeles (in the unincorporated areas of Lennox, Del Aire, and Athens), and City of El Segundo, which terminated its program in July 2018. Since El Segundo terminated their program, LAWA is looking at developing and implementing a sound insulation program for eligible homeowners in El

Segundo. In addition, the Program administers funding for the sound insulation of schools in the Lennox School District and the Inglewood Unified School District.

As noted above, Section 4.7.1.5.1.3 of the Draft EIR includes Mitigation Measure MM-AN (ATMP)-1, Sound Insulation Programs. The mitigation measure would apply to noise-sensitive uses that would be newly exposed to 65 dBA CNEL or greater from airport operations in future years of the proposed Project, including uses located within the City of Los Angeles or in other municipalities/jurisdictions. Property owners' eligibility for noise mitigation would be based upon FAA requirements and the LAX Part 150 Noise Exposure Maps in effect at the time of operation or completion of the proposed Project.

ATMP-PC038-72

Comment: 2. Will LAWA reopen residential soundproofing for other communities such as Inglewood? South Los Angeles? El Segundo? Unincorporated Los Angeles County areas such as Lennox?

Response: Please see Response to Comment ATMP-PC038-71 above regarding eligibility of residential properties for noise mitigation.

ATMP-PC038-73

Comment: 3. ARSAC is very concerned with the proposed Remain Overnight (RON) parking spaces between Terminal 1 and Concourse 0. Will LAWA place restrictions in place as a mitigation measure?
1. No aircraft under power to move to and from RON. Use of tug-and-tow only.
2. No engine run-ups or testing.
3. No use of Auxiliary Power Units (APU's). LAWA may make ground power and pre-conditioned air available here for aircraft cabin cleaning.
4. No loading or unloading of passengers and/or cargo.

Response: No significant aircraft noise impacts are anticipated to occur from the use of the two Remain Overnight (RON) positions for aircraft parking; hence, the types of restrictions requested by the commenter as a mitigation measure are unwarranted. Notwithstanding, it should be noted that, based on the proximity of the RON positions to the nearby gates at Terminal 1 and Concourse 0 and their intended use for aircraft parking, it is anticipated that, as a practical matter (operational and cost), movement of aircraft between the gates and the RON positions would be via an aircraft tug (i.e., rather than powering up the aircraft engines only to move an aircraft a few hundred feet, it would be better for a tug to move the aircraft). The proposed RON area is surrounded by aircraft taxiways/taxilanes and vehicle service roads (see Figure 2-8 in the Draft EIR), which makes use of the area impractical for engine run-ups and testing (i.e., engine thrust during testing would pose a potential hazard to aircraft and vehicles nearby). LAWA will consider the inclusion of ground power infrastructure and possibly pre-conditioned air systems in the more detailed design of the RON area; however, should they not be provided, it is anticipated that the need for parked aircraft to operate their

auxiliary power units for aircraft power and conditioning would be relatively limited. As a RON aircraft parking area, it is not intended or designed for the loading or unloading of passengers and/or cargo.

ATMP-PC038-74

Comment: 4. Low frequency noise. LAWA should study the sources of low frequency noise at LAX and the methods to reduce or eliminate low frequency noise.

Response: Section 4.7.1.1.2 of the Draft EIR provides an explanation of A-Weighted Sound Pressure Level (dBA) and Community Noise Equivalent Level (CNEL). The FAA-approved metric for assessing the impacts of aircraft noise is the CNEL metric, using A-weighted decibels to account for noise that is audible to the human ear. When expressed in dBA, the sound has been filtered to reduce the effect of very low and very high frequency sounds, much as the human ear filters sound frequencies. With A-weighting, calculations and sound monitoring equipment approximate the sensitivity of the human ear to sounds of different frequencies.

The study of low frequency noise is not a requirement under FAA Order 1050.1F except when assessing noise impacts from sonic booms, which are modeled in C-weighted decibels to account for low-frequency noise from impulsive noise sources, like the noise generated from a sonic boom.[1] As a result, noise modeling in the Draft EIR focuses on the assessment of aircraft noise using the CNEL metric in A-weighted decibels, which is the FAA-approved method for assessing noise impacts at airports.

[1] U.S. Department of Transportation, Federal Aviation Administration, 1050.1F Desk Reference, Version 2, pages 11-2, 11-14, and 11-15, February 2020. Available: https://www.faa.gov/about/office_org/headquarters_offices/apl/environ_policy_guidance/policy/faa_nepa_order/desk_ref/.

ATMP-PC038-75

Comment: 5. Did LAWA include “go arounds” in studying aircraft noise at LAX? “Go arounds” are when aircraft coming in for a landing are not permitted to land and have to fly low over the airfield or the surrounding communities to rejoin the arrival route to the airport.
6. Do “go arounds” affect the noise contour? To what extent?

Response: Section 3 of Appendix F.1 of the Draft EIR provides a description and detailed tables of aircraft operations modeled for the Draft EIR. As shown in Tables 3 and 4 of Appendix F.1, noise modeling includes annual average daily arrival and departure operations of fixed wing aircraft for both 2018 existing conditions and 2028 projected future conditions. Section 4 of Appendix F.1 details that modeled flight tracks were developed by "utilizing a proprietary preprocessor tool [which] imports into AEDT an unlimited number of modeled flight tracks using actual radar data that reflect real aircraft flight paths."

The FAA defines “go around” as instructions for a pilot to abandon his/her approach to landing, which will be followed by additional instructions.[1] Under a “go around” situation, pilots must be in constant contact with Air Traffic Control personnel and follow published missed approach procedures, which dictate altitude and direction (i.e., headings) that pilots must follow.[2] In addition, a pilot operating as a “pilot in command” of the aircraft can initiate a go-around for a number of reasons. The pilot in command has the ultimate responsibility for the safe operation of the aircraft and if they believe a go around is necessary, for whatever reason, they can execute the maneuver according to FAA procedures. The radar tracks used to develop the noise model tracks include the parts of the “go around” track that departs away from LAX and when the aircraft returns and joins the final approach to LAX. The tracks were combined with other departure and arrival noise model tracks that in similar locations. The use of the radar tracks ensures that "go around" operations of fixed wing aircraft that occurred in 2018 and were captured by LAX's Noise & Operations Monitoring System (NOMS) are included in noise modeling for all three scenarios modeled: Baseline (2018), proposed Project (2028), and Without Project (2028). They are, therefore, captured in the noise contours presented in Section 4.7.1 of the Draft EIR; however, these operations were not modeled separately. As a result, the extent to which they affect the noise contours is unknown.

[1] U.S. Department of Transportation, Federal Aviation Administration, Pilot/Controller Glossary, April 2014. Available: https://www.faa.gov/air_traffic/publications/media/pcg_4-03-14.pdf.
[2] U.S. Department of Transportation, Federal Aviation Administration, Aeronautical Information Manual, Section 5-5-5, Missed Approach. Available: https://www.faa.gov/air_traffic/publications/atpubs/aim_html/chap5_section_5.html.

ATMP-PC038-76

Comment: 9. Projected Future Baseline Conditions

Regarding ground traffic in Chapter 4 (page 4-4) Projected Future Conditions Baselines

Comment: The argument that LAMP projects completion should be part of the baseline is equally fallacious. LAWA has projected dramatic benefits which at this time are not in the least demonstrated. We do, however, know that with or without LAMP there will be dramatic increases in the use of LAX and therefore using a “future baseline” is even more misleading than using current conditions. Please read the letter from our attorney with regard to the use of Future Baseline Conditions.

Response: The content of this comment is similar to, and references, comment ATMP-PC038-8; please refer to Response to Comment ATMP-PC038-8.

ATMP-PC038-77

Comment: 10. Cumulative Impact (4.8.6)

Regarding Evaluation of Cumulative Impacts (page 4-4)

Comments and Questions: LAWA has stated that only approved projects in the timeframe qualified as being included in the cumulative projects. So additional contemplated but not approved airport and non-airport projects should also be included if LAWA uses the its own logic to use a future baseline.

Response: The assertion that LAWA stated that "only approved projects in the timeframe qualified as being included in the cumulative projects" is incorrect. Page 4-4 of the Draft EIR identifies cumulative projects as "closely related past, present, and reasonably foreseeable probable future projects," as defined in Section 15355 of the State CEQA Guidelines. The text further states that the EIR identified the relevant projects at/adjacent to LAX, and refers the reader to Table 3-1 in Section 3.4, Development Setting, of the Draft EIR. The text on page 4-4 does not say that those relevant projects were limited to "approved projects in the timeframe." Section 3.4, Development Setting, of the Draft EIR describes the approach to, and scope of, the cumulative impacts analysis completed for the proposed Project. As indicated therein, the State CEQA Guidelines provides for discussion of cumulative impacts to occur in two ways; (a) a list of past, present, and probable future projects, and (b) a summary of projections contained in an adopted planning document. The cumulative impacts analysis completed for the proposed Project used both approaches, as further described in Section 3.4. Table 3-1 of the Draft EIR lists past, present, and probable future (i.e., reasonably foreseeable) projects that relate to the proposed Project (i.e., have the potential to result in cumulative impacts when combined with the proposed Project). Within Table 3-1 are several projects that had not yet been approved when the Draft EIR analysis began (i.e., upon publication of the Notice of Preparation), but were considered to be reasonably foreseeable future projects. As such, the cumulative impacts analysis included approved projects as well as projects that had not yet been approved when the Draft EIR analysis began.

ATMP-PC038-78

Comment: 11. Mitigation Measures

ARSAC has raised these mitigation issues in the past and in NOP comment letters. We would like to see LAWA adopt some of these mitigation measures to resolve old and potential new problems that affect airport area residents. ARSAC requests that mitigation measures be implemented before a project element is completed, where feasible. Where LAWA cannot enact a mitigation on its own, LAWA should identify the appropriate City department or other agency and work with that department and agency to implement the mitigation:

Response: Responses to the individual mitigation measures suggested by the commenter are provided in Responses to Comments ATMP-PC038-79 through ATMP-PC038-93 below. In accordance with Section 15126.4 of the State CEQA Guidelines, the Draft EIR describes feasible measures which could minimize significant adverse effects of the proposed Project. It is not required, nor is it appropriate, for an EIR to include mitigation for effects

that would not be caused by the proposed Project. In accordance with Section 15097 of the State CEQA Guidelines, LAWA will prepare a Mitigation Monitoring and Reporting Program (MMRP) for the proposed Project. The MMRP will identify the timing of implementation for each measure, monitoring frequency, and actions indicating compliance. The MMRP will also identify whether a measure is the responsibility of another agency.

ATMP-PC038-79

Comment: Neighborhood Protection Mitigations
1. Neighborhood protection 1- LAWA sets up a parking lot on LAWA owned land for off duty busses, shuttles, taxis, limos, TNC's so that they do not park in the Westchester Central Business District or in surrounding neighborhoods. The off-duty parking lot should have public restrooms and a convenience store or vending machines. This off-duty lot is a necessary mitigation measure to remove these vehicles from taking up customer parking in the Westchester Central Business District and the surrounding residential community. Perhaps a shuttle bus to the Westchester Central Business District, not necessarily operated by LAWA?

Response: Please see Topical Response TR-ATMP-T-2 regarding VMT mitigation measures and monitoring for the LAX Airfield and Terminal Modernization Project. The topical response addresses the additional mitigation measures requested by the commenter. As indicated therein, there is already a transportation network company (TNC) holding lot for vehicles waiting to pick up passengers/employees from LAX. LAWA has an online LAX Ground Transportation Comment Form (https://www.flylax.com/lax-comments-and-contact-us/lax-ground-transportation) that provides a means for the public to report an inappropriate staging of a commercial vehicle (i.e., parked car in a neighborhood or retail lot), which a citation/fine can be issued to the driver through the LAWA contract with the operator. It should be noted that LAWA does not have any control over where private shuttles, buses, and TNCs layover when not in service. Whether these vehicles park in the Westchester Central Business District, or elsewhere, when they are not in service is not an environmental impact requiring mitigation under CEQA.

ATMP-PC038-80

Comment: 2. Neighborhood Protection 2- Signage to and from LAX should be oriented to direct traffic towards Century Boulevard to the extent possible.

Response: The comment will be included in the Final EIR for consideration by the decision-makers prior to taking any action on the LAX Airfield and Terminal Modernization Project.

ATMP-PC038-81

Comment: 3. Neighborhood Protection 3- FlyAway busses shall be prohibited on Sepulveda between Centinela to the north and Westchester Parkway to the south between the hours of 11:00pm and 6:00am.

Response: Please see Topical Response TR-ATMP-T-2 regarding VMT mitigation measures and monitoring for the LAX Airfield and Terminal Modernization Project. The topical response addresses the additional mitigation measures requested by the commenter, including this one as related to the FlyAway route and hours of service. Restricting the hours of operation of FlyAway buses, as suggested by the commenter, would not reduce passenger VMT. In addition, there is no evidence suggesting that this restriction is necessary in order to avoid or lessen a significant environmental effect. Further, the City's Mobility Plan 2035, described on page 4.8-21 of the Draft EIR designates the segment of Sepulveda Boulevard mentioned in the comment as a Comprehensive Transit Enhanced Street with a functional classification of Boulevard I. It is part of the Transit Enhanced Network, which covers approximately 300 miles through the City on streets that the City has determined it is appropriate for the investments that prioritize transit. In addition, the Westchester-Playa del Rey Community Plan (page III-41) includes an objective to "[c]ontinue to encourage improved and additional local and express bus service and neighborhood shuttles throughout the Westchester-Playa del Rey Community Plan Area."[1] To prohibit buses from using a major arterial specifically designated by the City for investments to promote transit use would be inconsistent with adopted plans and policies, and could actually increase VMT due to buses being diverted to a less direct route.

[1] City of Los Angeles, Department of City Planning, Westchester - Playa del Rey Community Plan, adopted April 13, 2004, amended September 7, 2016. Available: https://planning.lacity.org/odocument/67450916-225a-4a55-97a5-8fa184a7e91d/Westchester-Playa_Del_Rey_Community_Plan.pdf.

ATMP-PC038-82

Comment: 4. Neighborhood Protection 4- Construction of a fully enclosed aircraft engine run enclosure, also known as a Hush House. Examples include Tokyo Narita Airport in Japan. LAWA has not committed to a run-up location and ARSAC keeps requesting this structure to be built when commenting on EIR's.

Response: Routine inspections and maintenance of aircraft are regularly performed at LAX in accordance with FAA requirements. As part of these activities, the FAA requires that aircraft engines be tested at various power levels while the aircraft is out of service and on the ground in a stationary position to ensure the engines' proper operation prior to the aircraft being returned to service, a practice that is referred to as an engine "ground run-up." The purpose of ground run-up enclosures (GREs) is to attenuate, through shielding and absorbing, the noise generated by aircraft during engine run-ups. The proposed Project does not include any new or relocated maintenance facilities at LAX.

Moreover, as described in Section 2.3.1.2 and Appendix B.1 of the Draft EIR, the future aircraft activity level at LAX in 2028 could be accommodated by existing facilities without the implementation of the proposed Project. Therefore, the proposed Project would not result in increased maintenance activities or an increased number of engine ground run-ups, and would not result in any noise impacts related to engine ground run-ups. Accordingly, construction of a GRE at LAX is not required to mitigate noise impacts from the proposed Project. Notwithstanding the above, it should also be noted that aircraft engine ground run-ups are strictly regulated by LAX Rules and Regulations[1] and by City Ordinance 186390,[2] which, among other things, prohibit ground run-ups between the hours of 11:00 p.m. and 6:00 a.m., which serves to avoid noise impacts to surrounding communities during late night hours.

[1] City of Los Angeles, Los Angeles World Airports, Los Angeles International Airport Rules and Regulations, July 1, 2021. Available: https://www.lawa.org/en/rules-and-regulations/lax-rules-and-regulations.
[2] City of Los Angeles, Ordinance 186390, Adopted October 29, 2019, Effective December 18, 2019. Available: https://www.lawa.org/-/media/lawa-web/lawa-rules-and-reg/lax-rules/appendix-14--lax-maintenance-restriction-penalty.

ATMP-PC038-83

Comment: 5. Traffic mitigation and reduction- LAWA will work with airlines and Metro in promoting mass transit to and from LAX.

Response: Please see Topical Response TR-ATMP-T-2 regarding VMT mitigation measures and monitoring for the LAX Airfield and Terminal Modernization Project. The topical response addresses the additional mitigation measures requested by the commenter and explains that the requested mitigation would be accommodated under the Market and Promote Alternative Transportation Options component of MM-T (ATMP)-1.

ATMP-PC038-84

Comment: 6. Capacity cap- Extend a gate cap to 2050. LAWA must actively work with airlines to consider increasing service at underserved or unserved airports in the region that want additional or new airline service.

Response: The comment regarding what the commenter characterizes as extension of a "gate cap" at LAX is noted and will be included in the Final EIR for consideration by the decision-makers prior to taking any action on the LAX Airfield and Terminal Modernization Project. Please see Responses to Comments ATMP-AR002-2 and ATMP-AL007-3 regarding other regional airports in relation to LAX and the LAX Airfield and Terminal Modernization Project Draft EIR.

ATMP-PC038-85

Comment: 7. Capacity conservation. When LAX exceeds 90 MAP, LAWA must include options in any future LAX projects that includes expansion at Palmdale Regional Airport or another existing or future regional airport to offset increased demand at LAX. LAWA should encourage airlines to consider increasing service at underserved or unserved airports in the region that want additional or new airline service.

Response: Please see Responses to Comments ATMP-AR002-2 and ATMP-AL0007-3 regarding other regional airports in relation to LAX and the LAX Airfield and Terminal Modernization Project Draft EIR.

ATMP-PC038-86

Comment: 8. Security- all TNC and other for hire ground transportation service companies at LAX must have airport badging with fingerprint criminal background check.

Response: Please see Topical Response TR-ATMP-T-2 regarding VMT mitigation measures and monitoring for the LAX Airfield and Terminal Modernization Project. The topical response addresses the additional mitigation measures requested by the commenter, and explains that TNCs are operated by private companies and the drivers are not airport-related employees.

ATMP-PC038-87

Comment: 9. Implement all roadway mitigations indicated by a complete traffic study of the magnitude done for SPAS.

Response: The commenter asks that an extensive program of off-airport roadway mitigation measures be developed through preparation of a transportation impact study similar to what was prepared for the LAX Specific Plan Amendment Study. The study referred to in the comment was prepared in 2012 in a different regulatory environment when congestion-related measures, such as level of service and delay, were used to assess the significance of transportation impacts at specific locations. The current metric of vehicle miles of travel (VMT) by definition considers transportation impacts across a broad study area. Mitigation measures, however, are not focused on specific locations but are rather intended to reduce the number and length of vehicle trips. Please see Section 4.8.3.1.1 of the Draft EIR and Topical Response TR-ATMP-T-1 regarding CEQA transportation analysis requirements.

ATMP-PC038-88

Comment: 10. Staging lot. Taxis are parked along the south side of Westchester Parkway between Jenny Street and Sepulveda Eastway. There are "Taxi only" parking signs in this area. As

an additional mitigation measure to get airport traffic away from residential areas, LAWA needs to have a staging lot for taxis, limos, town cars, TNC's, shuttle vans and buses.

Response: Please see Topical Response TR-ATMP-T-2 regarding VMT mitigation measures and monitoring for the LAX Airfield and Terminal Modernization Project. The topical response addresses the additional mitigation measures requested by the commenter. LAWA currently provides a holding lot, with toilet facilities and a scheduled food truck, adjacent to the future Intermodal Transportation Facility-West, located away from the Westchester Central Business District. This lot is available free of change to all permitted commercial vehicles waiting to pick up passengers/employees from LAX. This holding lot is open 22 hours a day, from 3:00 a.m. to 1:15 a.m. In addition, LAWA has a taxi holding/queueing lot located between 96th Street and 98th Street east of Vicksburg Avenue. LAWA does not have any control over where private shuttles, buses, and TNCs layover when not in service. Whether these vehicles park in the Westchester Central Business District, or elsewhere, when they are not in service is not an environmental impact requiring mitigation under CEQA. For this reason, whether to incorporate the commenter's proposals into the proposed Project is a policy decision that will be forward to decision-makers for their consideration.

ATMP-PC038-89

Comment: 11. Employee parking. ARSAC is seeing people working at LAX parking on Sepulveda Eastway and other local streets and walking to Lots C and D to catch a shuttle van to the Central Terminal Area (CTA). LAWA needs to implement policies that deter this kind of behavior and encourage people working at LAX to park in a paid parking lot (public or private) or use public transportation to their employment at LAX.

Response: The commenter asserts that there are LAX employees parking on local streets instead of in employee designated locations and taking a shuttle from LOT C/D to the Central Terminal Area (CTA). LAWA has not observed this happening nor are they actively monitoring those streets for employee parking. LAWA cannot mandate that employees do not park on City streets but strongly encourages all employees to participate in the remote employee parking program that provides various off-site lots in the vicinity of the CTA for employees to use. This, coupled with the employee shuttle service to the CTA, is designed to limit employees parking off-site in the local neighborhoods. LAWA will continue to actively encourage employees to take advantage of these facilities.

ATMP-PC038-90

Comment: 12. TNC neighborhood pick up restrictions. As a mitigation measure for LAX area neighbors, LAWA needs to issue new regulations to taxis, limos, town cars, and especially TNC's to discourage the problem of people who do not live in Westchester, Playa del Rey, El Segundo and other airport adjacent neighborhoods, but park their car on a neighborhood street and then use a TNC to get to LAX in order to avoid paying for airport parking.

Response: The content of this comment is similar to comment ATMP-PC010-4; please refer to Response to Comment ATMP-PC010-4.

ATMP-PC038-91

Comment: 13. Noise restrictions for the proposed Remain Overnight (RON) between Terminal 1 and Concourse 0:
1. No aircraft under power to move to and from RON. Use of tug-and-tow only.
2. No engine run-ups or testing.
3. No use of Auxiliary Power Units (APU's). LAWA may make ground power and pre-conditioned air available here for aircraft cabin cleaning.
4. No loading or unloading of passengers and/or cargo

Response: The content of this comment is similar to comment ATMP-PC038-73; please refer to Response to Comment ATMP-PC038-73.

ATMP-PC038-92

Comment: 14. Ongoing robust VMT monitoring to continue until the permanent closure of LAX. We are not advocating for closure of LAX; we are suggesting an end date so that the commitment is not a "forever" requirement.

Response: The commenter requests an ongoing robust VMT monitoring that will continue until the "permanent closure of LAX". The duration of the monitoring program is documented in Section 4.8.5.2.2 of the Draft EIR and will be for a period of three years of sustained VMT reduction from the applicable project baselines. LAWA has revised the Draft EIR to extend that period to five years of sustained VMT reduction. Please see Chapter F3, Corrections and Clarifications to the Draft EIR. Once this target has been met, the monitoring will no longer be required due to the mitigation measures achieving their specified targets. The requirement for monitoring to show that the target is met for five consecutive years and the removal of a monitoring requirement is consistent with the draft update to the City's TDM Ordinance that was released in June 2021. Monitoring of passenger VMT and induced travel VMT is considered infeasible and those impacts were found to be significant and unavoidable. Please see Topical Response TR-ATMP-T-2 regarding VMT mitigation measures and monitoring for the LAX Airfield and Terminal Modernization Project.

ATMP-PC038-93

Comment: 15. FlyAway buses have access to the CTA after the ATMP is completed to ensure public use and convenience. Fares should be the same or less than comparable ground transport even if LAWA has to subsidize the service. Headways should be short. Long distance routes to places like Irvine are not viable. LAWA needs to do a better job to advertise and promote FlyAways to ensure higher ridership. Different forms of payment should be accepted (cash, debit card, credit card, prepaid vouchers).

Response: The VMT reduction strategy regarding FlyAway service as part of MM-T (ATMP)-1 is included as an additional strategy that could be implemented by LAWA as part of the menu of VMT strategies included in the Draft EIR. Please see Topical Response TR-ATMP-T-2 regarding VMT mitigation measures and monitoring for the LAX Airfield and Terminal Modernization Project. As indicated therein, the FlyAway service is continually evolving based on demand. Over time the service routes, headways, fares and acceptable form of payment may evolve to better address needs of passengers.

ATMP-PC038-94

Comment: 12. Mobility Plan 2035 (4.8.6.1.2)

ARSAC is concerned about pedestrian, disabled, and bicyclist safety as a part of ATMP. The ATMP turns Sepulveda Southbound between Lincoln and Imperial Hwy into a free flowing road. Without crosswalks, bridges or tunnels for pedestrians, people in wheelchairs or motorized scooters and bicyclists to safely cross ARSAC Alliance for a Regional Solution to Airport Congestion Sepulveda, we fear many possible deaths. This danger would be heightened if people were forced to flee the Central Terminal Area by foot, wheelchair, scooter, skateboard or bicycle. This looks like an Americans with Disabilities Act compliance situation.

Questions:
1. For pedestrian access and safety, will there be crosswalk, bridges or tunnels for pedestrians to cross Sepulveda at Lincoln Blvd? Sepulveda and 96th Street? Sepulveda and Century Blvd?

Response: It is unclear as to what the commenter means in claiming that the proposed Project would turn southbound Sepulveda Boulevard, between Lincoln Boulevard and Imperial Highway, into a "free flowing road." The proposed Project would not remove any traffic signals along that stretch of Sepulveda Boulevard, including the existing signals at Lincoln Boulevard, W. Century Boulevard, and Imperial Highway.

Regarding crosswalks, the existing marked crosswalks at/near the intersection of Lincoln Boulevard and Sepulveda Boulevard would be retained, including the crossing of Lincoln Boulevard on the west side of Sepulveda Boulevard, and then the crossing of Sepulveda Boulevard at W. 92nd Street, located approximately 400 feet north of Lincoln Boulevard.

At the intersection of Sepulveda Boulevard and 96th Street, the marked crosswalk on the east side of Sepulveda Boulevard would be retained, but would be slightly modified to account for the proposed slip lane (i.e., exit) from northbound Sepulveda Boulevard to the new access road to the CTA. With the proposed removal of the existing Sky Way bridge over Sepulveda Boulevard near 96th Street, pedestrians would no longer be able to cross above Sepulveda Boulevard. That existing above-grade crossing serves to provide pedestrian access to and from the CTA via Sky Way; however, with the development of Concourse 0, Sky Way would be removed and there would no longer be any access to or from the CTA at that location on Sepulveda Boulevard. As such, there

would be no need to replace that crossing of Sepulveda Boulevard. It should be noted that with the removal of the existing Sky Way bridge and the associated Sky Way exit from northbound Sepulveda Boulevard, the existing cross-walk at the Sky Way exit would be replaced by a continuous sidewalk along the west side of Sepulveda Boulevard, which would improve the safety and comfort of pedestrian and wheelchair travel along that segment.

ATMP-PC038-95

Comment: 13. Alternatives (Chapter 5)

The proposed Project and alternatives do not comply with the MOU. The details are in the letter from our attorney.

Questions:
1. What will LAWA do to make the AMTP conform to the MOU?
2. Will LAWA propose additional MOU compliant alternatives before proceeding to a Final EIR?

Response: This comment is similar to ATMP-PC038-2 and ATMP-PC024; please see Responses to Comments ATMP-PC038-2 and ATMP-PC038-24. As noted in those responses, the proposed Project is not out of conformance with the MOU. No additional alternatives are required to be included in the Final EIR in order to fulfill LAWA's obligations under the MOU.

ATMP-PC038-96

Comment: 14. Alternatives Considered but Rejected

LAWA presented a West Terminal as an alternative that it rejected in the ATMP DEIR. ARSAC thanks LAWA for recognizing that the communities surrounding LAX would oppose that proposal. Additionally, such a "straw man" proposal also goes against LAWA's plans for passenger convenience and to remove passenger operations from the west end of the LAX airfield as stated in the LAX Master Plan Alternative D and FAA Record of Decision (May 20, 2005). Pursuant to the LAX Specific Plan, the LAWA Executive Director is supposed to write a report of how a project complies with the objectives of the LAX Plan. Objective 5 is, "Lead the effort to regionalize air service in Southern California by forging strategic partnerships that connect LAX and other regional airports." LAWA has been failing in this objective for the past 10 years by marking it as "Not applicable" in the case of the Terminal 4 Modernization (September 3, 2020). Reference, "LAX Specific Plan Section 7 (Ordinance No. 176,346 as amended by Ordinance No.179,148 and Ordinance No. 182,542 and Ordinance No.184,348 and Ordinance No.185,164) mandates that the Executive Director makes recommendation regarding LAX Specific Plan Compliance for all projects (as defined in the LAX Specific Plan) to the Board of Airport Commissioners (BOAC) prior to construction and issuance

of any grading permit, building permit, use of land permit, or initiation or construction of any project."

Questions:
1. In previous EIR's, LAWA had included a "regionalization" alternative of moving some or all operations to other LAWA owned airports such as Palmdale Regional Airport (PMD). Why was this not included?
2. Does LAWA has a written regionalization plan with a budget, goals and objectives? When and where are the regionalization plans presented? Who is in charge of LAWA's regionalization plan? Name, title and contact information?
3. Considering that the airline industry believes that the travel industry will begin to rebound in 2023 and Los Angeles is hosting the 2028 Olympic and ParaOlympic Games, why is LAWA not considering development of PMD to provide additional airport capacity for the 2028 Games?
4. LAWA purchased 17,750 acres of land in Palmdale for a future Palmdale Intercontinental Airport. The City of Los Angeles approved a PMD EIR and successfully defended the EIR from litigation in the 1970's. Will LAWA consider developing PMD on its own? In a Joint Powers Authority with the City of Palmdale?
5. Will LAWA consider transferring PMD land holdings to the Palmdale Airport Authority on the same commercial terms as LAWA did ONT to the Ontario International Airport Authority?

Response: The commenter's concurrence with the Draft EIR's rejection of the West Terminal Alternative as being a feasible alternative to the proposed Project is noted.

In accordance with Section 7 of the LAX Specific Plan, the Executive Director will determine whether the Project complies with the LAX Plan and all applicable provisions of the Specific Plan and, if the Executive Director determines that the Project is consistent with the LAX Plan, all applicable provisions of the Specific Plan, and with the requirements of CEQA, will prepare a written report and transmit this report to BOAC for its action on the LAX Specific Plan Compliance request. That review and determination are to be completed as part of the entitlement process that will occur in conjunction with certification of the Final EIR, which is separate from completion of the Draft EIR.

Regarding the commenter's question relative to previous EIRs that included a "regionalization" alternative involving moving some or all of LAX's operations to other LAWA-owned airports, such as Palmdale Regional Airport, please note that the use and operation of Palmdale Regional Airport is now under the authority of the City of Palmdale – Palmdale Airport Authority, not LAWA. Further, the discussion of that topic was included in the LAX Master Plan EIR[1] and in the LAX Specific Plan Amendment Study EIR.[2] As described in those documents, increased levels of service at other airports, such as Palmdale Regional Airport and other airports in the region, will not replace the need to modernize LAX to meet LAWA's goals for LAX, including the objectives of those projects. That is also the case with the currently proposed LAX Airfield and Terminal Modernization Project, as explained in Section 5.4.1.1 of the Draft EIR and as further discussed in Responses to Comments ATMP-AR002-2 and ATMP-AL007-3. Regarding the commenter's questions pertaining to Palmdale Regional Airport,

such questions are outside the scope of the LAX Airfield and Terminal Modernization Project.

[1] City of Los Angeles, Los Angeles World Airports, Final Environmental Impact Report for Los Angeles International Airport (LAX) Proposed Master Plan Improvements, (SCH 1997061047), Section 3.1.1.2, April 2004. Available: https://www.lawa.org/lawa-our-lax/environmental-documents/documents-certified/2004-lax-master-plan-program/final-environmental-impact-report-feir
[2] City of Los Angeles, Los Angeles World Airports, Final Environmental Impact Report for Los Angeles International Airport (LAX) Specific Plan Amendment Study, (SCH 1997061047), Topical Response TR-SPAS-REG-1: Regionalization, January 2013. Available: https://www.lawa.org/lawa-our-lax/environmentaldocuments/documents-certified/specific-plan-amendment-study/documents.

ATMP-PC038-97

Comment: 15. Appendix A Notice of Preparation/Scoping

Comments and Questions:
1. The 500 foot property radius is inadequate to inform the public of changes occurring at LAX. Projects at LAX are mega projects costing billions of public dollars and affect a wider area than just adjacent property owners. At least 2 mile radius should be used to notify property owners of proposed LAX projects.

Response: The comment states that LAWA should have provided notice to property owners located within a larger geographic area surrounding LAX. The request for expanded notice is noted. As explained below, however, LAWA did provide notice in excess of the procedural requirements of CEQA. CEQA requires that a lead agency mail notice of the availability of a Draft EIR to the last known name and address of all organizations and individuals who have previously requested such notice in writing in addition to one of the following procedures: publication at least one time in a newspaper of general circulation in the area affected by the proposed project, posting the notice on and off the site in the area where the project is to be located, or direct mailing to the owners and occupants of property contiguous to the parcel or parcels on which the project is located. (State CEQA Guidelines Section 15087(a).) LAWA's distribution of notices regarding the availability of the Draft EIR exceeded these requirements. The notice of availability was published in four regional and local newspapers (Los Angeles Times, Argonaut, Daily Breeze, and La Opinión); three of these notices were published in English and one was published in Spanish. In addition, the notice was mailed to all organizations and individuals who previously requested such notice, as required by CEQA, as well as to thousands of additional recipients, including agencies, organizations, and individuals who LAWA determined may have an interest in the Project; surrounding jurisdictions; airport tenants and lessees; and owners and occupants generally located within a 500-foot radius of the airport. In addition, LAWA established a Project webpage, with information about the Project, including a link to the Draft EIR and a link to provide comments on the Draft EIR. LAWA also created a virtual open house with detailed

information about the proposed Project and the Draft EIR analysis and held a virtual public meeting during the Draft EIR comment period that provided stakeholders with a presentation on the proposed Project and the Draft EIR analysis, as well as an opportunity for questions and answers. The wide distribution of the notice, in addition to the online website and online communication opportunities, was more than adequate to inform the public of the proposed Project.

ATMP-PC038-98

Comment: 2. ARSAC encourages LAWA to use the LAX Northside Project as model for community outreach for future LAX projects. The LAX Northside EIR faced no opposition as LAWA had met with the community before starting the EIR process and adopted community input into the LAX Northside Plan. Community stakeholders felt that they had a voice in the process and saw some of their ideas incorporated into the project. By taking a "working together" approach LAWA will resolve community concerns upfront in the project rather than the current unsatisfactory adversarial process.

Response: This comment is noted. The comment will be included in the Final EIR for consideration by the decision-makers prior to taking any action on the LAX Airfield and Terminal Modernization Project. Please also see Response to Comment ATMP-PC038-34 regarding public outreach. As noted in that response, as of the close of the public review period for the Draft EIR, LAWA had held over 140 meetings and/or briefings with agencies, neighboring jurisdictions, and other stakeholders and interested parties concerning the proposed Project since 2018. No further response is required because the comment does not raise any significant environmental issues. (See Public Resources Code Section 21091(d); State CEQA Guidelines Sections 15088(c), 15204(a).)

ATMP-PC038-99

Comment: 16. Appendix B Activity Forecasts and Operational Analyses

The Constrained Forecast in Appendix B (Activity Forecasts and Operational Analyses) assumes in its SIMMOD computer simulations that future gate numbers and locations (pgs. 73-75) and project taxiways improvements (pgs. 89-90) would be adequate to accommodate the Constrained Forecast. Both the Unconstrained and Constrained forecast use a regression analysis based on historic socioeconomic factors in the Los Angeles Long Beach Combined Statistical Area (CSA) and LAX passenger and operational activity, from 2007 to 2017. The Constrained Forecast diverges from the Unconstrained Forecast after 2030, when an "acceptable" average annual delay per aircraft operation of 15 minutes is reached, according to the SIMMOD simulations. The basic problem with this methodology is that it has become largely irrelevant. The COVID pandemic has completely upended and disconnected correlations between LAX activity and socioeconomic variables, and has made activity trends since 2007 extraneous. Because of the pandemic from 2019 to 2020 passenger levels at LAX plunged by 51%, from 88 million air passengers (MAP) to 44.8 MAP. Moody's recently predicted that U.S. aviation activity won't fully recover until 2024 at the earliest, and probably years later after that.

Both the Unconstrained and Constrained forecast show LAX at 100.3 MAP in 2024, which is completely unrealistic.

The Constrained Forecast assumes that airlines will adjust to increasing delays by using larger aircraft, increasing load factors and revising flight schedules. The legacy of COVID will likely be lower, not higher load factors in the future, so this assumption is specious. Instead of acquiring expensive larger aircraft, airlines will more likely raise air fares to maintain profit margins in the face of increasing airfield congestion, as well as shift flights to uncongested alternate airports on the region. Reference March 8, 2021, San Francisco Chronicle Article, "In California, airlines move to smaller airports, vacation routes" https://www.sfgate.com/travel/article/California-airports-vacation-destinations-SFO-16006333.php

LAWA should go back to the drawing board to develop a much more accurate and credible Constrained Forecast for the ATMP EIR otherwise the EIR will be devoid of any realistic credibility. This includes a more realistic Unconstrained Forecast to reflect the reality of the current pandemic on current and future aviation demand, and more realistic assumptions about how airlines will likely react to increasing airfield congestion at LAX.

Response: The commenter claims that the constrained demand scenario and the airfield SIMMOD simulations documented in Appendix B of the Draft EIR have become "largely irrelevant" due to the impacts of the COVID-19 global pandemic. The commenter further provides an opinion about anticipated recovery in aviation activity by 2024; and concludes that LAX would not recover to the levels documented in the Draft EIR forecasts by 2024. Please see Topical Response TR-ATMP-G-1 for information regarding the uncertainties associated with the anticipated post-COVID-19 global pandemic recovery.

The commenter also discusses the assumptions made in the Draft EIR forecasts (regarding passenger load factors, aircraft sizes, and schedule adjustments) based on its interpretation of how airlines will operate post-COVID-19 global pandemic recovery. The commenter also provides an article published by the San Francisco Chronicle in March 2021. This article discusses the effects of the COVID-19 global pandemic on business travel, and how the airlines have focused on leisure destinations, smaller airports, and improving aircraft cleanliness.

As discussed in the Preamble to the Draft EIR, assumptions documented in the forecast report (Appendix B.1 of the Draft EIR) were developed before the COVID-19 global pandemic emerged. Please see Topical Response TR-ATMP-G-1 for information regarding the uncertainties associated with the anticipated post-COVID-19 global pandemic recovery.

In the last paragraph, the commenter recommends that LAWA prepare a new set of forecasts (unconstrained and constrained) to reflect the realities of the COVID-19 global pandemic recovery. Please see Topical Response TR-ATMP-G-1 for information regarding the uncertainties associated with the anticipated post-COVID-19 global pandemic recovery.

ATMP-PC038-100

Comment: Comments and Question on Capacity (Appendix B, Sections 3.5 and 3.6):
The ATMP anticipates an increase from 2,013 flights per day in 2019 to over 2,253 flights per day in 2028. ARSAC is very concerned that neither the sky nor the LAX airfield can support over 2,200 flights per day. In the past 25 years, ARSAC has seen the effects of congestion at LAX, especially when LAX has approached 2,000 flights a day:
1. When the airfield is full, landing aircraft are forced to do a "go around" and fly low over the airfield and surrounding communities to rejoin the arrival flight pattern.

Response: The commenter asserts that "when the airfield is full" FAA Air Traffic Control (ATC) personnel direct landing aircraft to "'go around' and fly low over the airfield and surrounding communities to rejoin the arrival flight pattern." The commenter is concerned that the increase in aircraft operations documented in Table 1-2 of Appendix B.2 of the Draft EIR (from 2,013 daily operations in 2018 to 2,253 aircraft operations forecasted in 2028) will result in increased aircraft "go around" procedures. The commenter does not provide any evidence to support its assertion. The FAA defines "go around" as instructions for a pilot to abandon his/her approach to landing, which will be followed by additional instructions.[1] Therefore, aircraft "go around" procedures discussed by the commenter are not procedures published by the FAA. Under a "go around" situation, pilots must be in constant contact with ATC personnel and follow published missed approach procedures, which dictate altitude and direction (i.e., headings) that pilots must follow.[2] In addition, a pilot operating as a "pilot in command" of the aircraft can initiate a go-around for a number of reasons. The pilot in command has the ultimate responsibility for the safe operation of the aircraft and if they believe a go around is necessary, for whatever reason, they can execute the maneuver according to FAA procedures. Therefore, "go around" may continue to occur at LAX regardless of the proposed Project improvements. In addition, the operations forecast presented in Table 1-2 of Appendix B.2 of the Draft EIR is expected to occur with or without the proposed Project. Please see Topical Response TR-ATMP-G-1 regarding the aviation demand forecast and future aviation activity at LAX.

[1] U.S. Department of Transportation, Federal Aviation Administration, Pilot/Controller Glossary, April 2014. Available:
https://www.faa.gov/air_traffic/publications/media/pcg_4-03-14.pdf.
[2] U.S. Department of Transportation, Federal Aviation Administration, Aeronautical Information Manual, Section 5-5-5, Missed Approach. Available:
https://www.faa.gov/air_traffic/publications/atpubs/aim_html/chap5_section_5.html.

ATMP-PC038-101

Comment: 2. Airfield congestion at LAX results in the FAA placing gate holds on aircraft at originating airports. The authors of this comment have experienced gate holds at Oakland International Airport (OAK) and even as far away as Minneapolis/St Paul (MSP) when flying back to LAX. While gate holds delay flights, it does provides safety in that jets are not circling above their arrival airport running low on fuel. Gate holds also demonstrate

air traffic control system limitations. Airlines control flight schedules; airports do not and the FAA rarely uses slot controls (e.g. Washington Reagan National, New York LaGuardia) to smooth out the number of flights.

Response: The commenter asserts that congestion at LAX has led to "gate holds" at other airports in the country and cites anecdotal gate hold events experienced by the commenter at Oakland International Airport and Minneapolis/St Paul International Airport. The commenter does not provide any evidence to support its assertion.

Gate hold is a procedure used by the FAA personnel to temporarily hold aircraft at their departure airport to reduce the number of flights going into an impacted area,[1] which may occur for a variety of reasons, as further described below.

The FAA utilizes a variety of mechanisms to manage demand into and out of airports throughout the U.S., including flow control, metering, ground/gate holds, and slot coordination. These mechanisms can be applied perpetually to address demand growth beyond a given airport's capacity or temporarily to mitigate shorter-term excess demand and/or reduced capacity events (e.g., weather, seasonal peaks, etc.). The FAA will employ any mechanisms available to maintain safe and efficient operations at LAX. Like aircraft "go around" procedures, gate holds, are the sole responsibility of the FAA and local airport management, and cannot be predicted.[2]

The airfield SIMMOD simulations were conducted based on typical operating configurations used at LAX documented in Section 3.2 of Appendix B.2 of the Draft EIR. The SIMMOD tool is set up to include random delays throughout the simulated day and calibrated to replicate real life conditions associated with aircraft delays (such as potential weather delays at originating airports). Therefore, it was unnecessary to consider potential gate holds at originating airports in this analysis because the airfield simulations already account for random delays that could be the result of gate holds at other airports and because gate holds cannot be predicted, specifically, 10 years into the future.

Please also see Topical Response TR-ATMP-G-1 regarding the aviation demand forecast and future aviation activity at LAX. For the reasons explained therein, any future increase in gate hold procedures would not be attributable to the proposed Project.

[1] U.S. Department of Transportation, Federal Aviation Administration, FAQ Weather Delay. Available: https://www.faa.gov/nextgen/programs/weather/faq/, accessed May 8, 2021.
[2] U.S. Department of Transportation, Federal Aviation Administration, Order JO 7210.3AA, October 2017, Paragraph 10-4-3. Available: https://www.faa.gov/documentLibrary/media/Order/7210.3AA__w_chg_1_dtd_3_29_18.pdf.

ATMP-PC038-102

Comment: 3. Has LAWA factored in weather delays at other airports affecting LAX operations?

Response: As documented in Section 3.1 of Appendix B.2 of the Draft EIR, LAWA's aviation experts Ricondo conducted airfield simulations to support the Draft EIR analyses. The airfield simulation model is set up based on operating procedures in the air and on the airfield specific to LAX. As further documented in Section 3.2 of Appendix B.2 of the Draft EIR, the airfield simulation model simulated various airfield operating conditions at LAX, to test operations under various weather conditions (reflecting wind speed and direction, as well as ceiling height and visibility). However, the airfield simulation model does not extend beyond the immediate vicinity around LAX because it is not a regional or national airspace model, and therefore does not factor in weather conditions at other airports. As discussed in Response to Comment ATMP-PC038-101, the SIMMOD tool is set up to include random delays throughout the simulated day and is calibrated to replicate real life conditions associated with aircraft delays which include potential weather delays.

ATMP-PC038-103

Comment: 4. Has LAWA factored in air traffic capacity delays at other airports affecting LAX operations?

Response: As documented in Section 3.1 of Appendix B.2 of the Draft EIR, LAWA's aviation experts Ricondo conducted airfield simulations to support the Draft EIR analyses. The SIMMOD airfield simulation model was set up based on operating procedures in the air and on the airfield specific to LAX and did not reflect air traffic delays at airports other than LAX because it is not a regional or national airspace model. As discussed in Response to Comment ATMP-PC038-101, the SIMMOD tool is set up to include random delays throughout the simulated day and calibrated to replicate real life conditions associated with aircraft delays which include potential operational delays at other airports than LAX.

ATMP-PC038-104

Comment: 5. Did LAWA consider when NexGen Air Traffic Control would be fully in effect? Will NexGen make LAX takeoffs and landings more efficient or less efficient?

Response: As defined by the FAA, NextGen is not one technology, product, or goal. It encompasses innovative and transformative technologies that are being developed and deployed after thorough safety testing, and include cutting-edge technologies, procedures, and policies that benefit passengers, the aviation industry, and the environment.[1]

The LAX Airfield and Terminal Modernization Project operational analyses accounted for FAA Air Traffic Control procedures that are reasonably foreseeable to be applicable at LAX through the planning horizon, including those specifically related to NextGen initiatives (e.g., wake turbulence recategorization).[2]

How and when the NextGen initiatives continue to evolve and be implemented in the future is the sole responsibility of the FAA, and LAWA cannot speculate as to whether NextGen would "make LAX takeoffs and landings more efficient or less efficient."

[1] U.S. Department of Transportation, Federal Aviation Administration, What is NextGen webpage. Available: https://www.faa.gov/nextgen/what_is_nextgen/, accessed May 8, 2021.
[2] U.S. Department of Transportation, Federal Aviation Administration, Fact Sheet – Wake RECAT, April 21, 2015. Available: https://www.faa.gov/news/fact_sheets/news_story.cfm?newsId=18676.

ATMP-PC038-105

Comment: Corrections requested and questions:

Table 2-1 on Page 2-9 shows Passenger Gate totals in excess of the MOU Exhibit A, Section II Paragraph C, Sentence 2 Maximum Gate Configuration requirements. Terminal 4 to 8 total 66 gates when the maximum is 64. North MSC shows 15 gates when the maximum allowed under the MOU is 12. The West Remote Gates should go to zero.

Response: The comment states that the "West Remote Gates should go to zero." For information on the West Remote Gates and the ARSAC / LAWA MOU, please see Topical Response TR-ATMP-G-2, and Responses to Comments ATMP-PC038-2, ATMP-PC038-41, and ATMP-PC038-44. No further response is required under CEQA as the comment does not raise significant environmental issues.

ATMP-PC038-106

Comment: Table 2-1 on page 2-9 may violate the 153 gate cap in effect through December 31, 2024 required by MOU Exhibit A, Section II, Paragraph A.

Response: The proposed Project would not result in an increase in gates beyond 153 before December 31, 2024. No further response is required under CEQA as the comment does not raise significant environmental issues. For information on passenger gates and the MOU, please see Topical Response TR-ATMP-G-2 and Response to Comment ATMP-PC038-2.

ATMP-PC038-107

Comment: Table 2-2 needs some updates and the 2018 DDFS and 2028 DDFS will also need to be updated to be accurate. LAWA should re-run with the 2018 DDFS and 2028 after it enters these corrections. The correct fleet is needed to provide more accurate data for the Noise and Air Quality sections of the CEQA EIR and the NEPA EA.

LAWA needs to consider the removal of certain aircraft types from the fleet for 2028: Boeing 747-400. Air France, British Airways and KLM have retired the 747-400 from their fleets. Careful analysis needs to be given to the Airbus A380 which airlines such as Air France have retired from their fleet. Other airlines likely to retain or bring back A380 service at LAX include British Airways, Emirates, Korean Air, Lufthansa and Qantas. Korean Air has acquired rival Asiana Airlines and those aircraft will incorporated into the Korean Air fleet, possibly dropping the number of A380 flights at LAX.

Some airlines have used COVID-19 to rationalize their fleets much like the period after September 11, 2001. The airlines and these retired aircraft listed below should be removed from the 2028 DDFS.

"In 2020, Air Canada retired their entire Embraer 190 and Boeing 767-300ER fleets. The Embraer 190s were replaced by the Airbus A220 and Boeing 737 MAX 8, while the Boeing 767-300ER was replaced by the Airbus A330-300 and Boeing 787s." https://en.wikipedia.org/wiki/Air_Canada_fleet

American Airlines retired in 2020 Airbus A330-200, A330-300; Boeing 757 and 767; and Embraer 190. Retired from the American Eagle regional fleet were Embraer 140 and Bombardier CRJ-200 aircraft.
https://americanairlines.gcs-web.com/news-releases/news-release-details/american-airlines-reports-fourth-quarter-and-full-year-2020

Delta Airlines retired in 2020 the McDonnell Douglas MD-80 series and MD-90 series as well as its Boeing 777 fleet (777-200LR and 777-300ER). In 2023, the Boeing 717 will be retired. https://en.wikipedia.org/wiki/Delta_Air_Lines_fleet

United Airlines will begin replacing its Boeing 757 fleet with the Airbus A321XLR in 2024. United will also add the Airbus A350 beginning in 2027. https://en.wikipedia.org/wiki/United_Airlines_fleet

Response: The commenter asserts that Table 2-2 of Appendix B.2 of the Draft EIR (which lists the assumed commercial passenger airline assignments to terminals assumed in the gating analysis) needs to be updated to reflect recent changes. The commenter also suggests that the 2018 and 2028 design day flight schedules (DDFSs) should also be updated to reflect recent changes.

Section 1.1 of Appendix B.2 of the Draft EIR states:
"The DDFSs represent a reasonable depiction of anticipated aircraft operations and passenger activity levels expected to be representative of operations on a peak month average day (PMAD) at LAX. DDFSs are modeled representations of potential arriving and departing passenger and aircraft activity at LAX on a future PMAD; they are intended to provide an indication of potential future individual aircraft operator activity and service patterns, and are used as input files into technical analyses related to the LAX Airfield and Terminal Modernization Project. The DDFSs were developed based on results of the forecast analyses, presented in the LAX Airfield and Terminal Modernization Project Activity Forecasts Report and, therefore, include similar

uncertainties associated with predicting operational and scheduling characteristics, of future aircraft fleets."

Further, Appendix B.2 explains:
"Table 2-2 presents airline-terminal assignments assumed in the gating analysis. Note that these assumptions were based on information available at the time these analyses were conducted in 2018 and early 2019. These airline-terminal assignments were assumed for planning purposes and meant to be representative of anticipated airline locations in the future, understanding that commercial passenger airlines may start or cease service at LAX, or relocate to different terminals before FY 2028. Due to gate constraints, commercial passenger airlines may have been gated at terminals other than those listed in the table (e.g., at adjacent terminals). Gates at the North MSC and the West Remote Gates were assumed to be available to any commercial passenger airlines for which gates were not available at their originally assigned terminals." Thus the list of airlines in Table 2-2 is "representative of anticipated airline locations in the future"; it is not intended to provide a static list of existing or future airlines, and the analysis expressly recognizes that "commercial passenger airlines may start or cease service at LAX, or relocate to different terminals before FY 2028." These DDFS assumptions are critical due to the ever-evolving nature of airport operations and the aviation industry in general. Therefore, the information included in the DDFSs, at the time the Draft EIR technical analyses for the 2018 baseline year were prepared, was accurate and provided reasonable flight schedule assumptions, representative of expected aircraft activity at LAX.

The commenter lists a series of fleet changes and decisions made by the airlines as a result of the COVID-19 pandemic and asserts that retired aircraft on the list should be removed from the 2028 DDFS. Because the list of airlines on Table 2-2 is merely representative of anticipated airlines expected to operate at LAX in the future, it is not necessary to update the list to account for individual airline fleet changes. The method of analysis properly accounts for such fleet changes. It is also important to maintain a reasonable mix of older and newer aircraft types in the DDFSs to ensure that environmental analyses (such as noise and air quality) do not underestimate potential impacts as a result of including unreasonably newer aircraft and engine types.

The mix of airlines and aircraft in operations at LAX is very dynamic. The comment, as well as the comments that follow on specific airlines (comments ATMP-PC038-108, -109 and -110), illustrate the dynamic nature of airline and aircraft operations. If it were necessary to re-run the airline/aircraft gate assignments every time there is a change in airlines or aircraft, it would be necessary to repeatedly (if not perpetually) re-run the airfield simulation model using updated gate assignments and aircraft types. Because the DDFS is intended to be representative, rather than precisely predictive, it is not necessary to update the assignments or aircraft types in this fashion. The assignments performed in 2018 and early 2019 are therefore considered an appropriate basis for modeling conditions in the future.

See Topical Response TR-ATMP-G-1 for additional information regarding the uncertainties associated with the anticipated post-COVID-19 global pandemic recovery.

It is important to note that removing older aircraft types from the fleet (as suggested by the commenter) would result in having a greater proportion of newer aircraft and engines (which are less noisy and more fuel efficient) in the noise and air quality analyses, which, in turn, could underestimate potential environmental impacts. The DDFSs used in the Draft EIR provided a mix of older and newer aircraft and engine types, which provide a reasonable and conservative activity basis of the environmental analyses.

Therefore, the aircraft activity assumed in the 2018 and 2028 DDFSs is representative of flight activity anticipated at LAX, based on previous activity analyzed by LAWA's aviation experts and their professional judgement on assumptions of anticipated future schedule characteristics. No change to the 2018 and 2028 DDFSs is therefore required.

ATMP-PC038-108

Comment: For Terminal 2, the following corrections are needed:
XL Airways France is not listed. XL began flying to LAX in June 2016 and ceased operations on September 23, 2019. Was this airline and aircraft considered in the 2018 DDFS? This airline and aircraft should be excluded from the 2028 DDFS.
LAWA press release June 1, 2016, announcing XL Airways Airbus A330 flights 3 times a week to Paris, France from Terminal 2
https://www.lawa.org/news-releases/2016/news-release-97
XL Airways France shutdown September 23, 2019. Wikipedia article:
https://en.wikipedia.org/wiki/XL_Airways_France

Response: The commenter discusses XL Airways, a French airline, which ceased operations in September 2019. As discussed in Response to Comment ATMP-PC038-107, the list of airlines in Table 2-2 is "representative of anticipated airline locations in the future"; it is not intended to provide a static list of existing or future airlines, and the analysis expressly recognizes that "commercial passenger airlines may start or cease service at LAX, or relocate to different terminals before FY 2028."

XL Airways was not included in the 2018 baseline Design Day Flight Schedule (DDFS) because XL Airways did not provide daily service to LAX, and was therefore not included in the list of flights in the flight schedule used to prepare the 2018 DDFS.

However, during the process of reviewing airlines anticipated to provide service to LAX in the 2028 DDFS, LAWA's aviation experts assumed XL Airways would operate on a Peak Month Average Day (PMAD) in 2028 at LAX. Please see Response to Comment ATMP-PC038-107 for a discussion of the many factors assumed in the Draft EIR DDFSs to provide reasonable indication of potential future aircraft operator activity and service patterns. Therefore, the two XL Airways flights assumed in the 2028 DDFS are representative of flight activity by any airline, not necessarily XL Airways, operating a widebody aircraft from Paris (or any airport in western Europe) to Los Angeles. No change to the 2028 DDFS is required.

ATMP-PC038-109

Comment: For Terminal 6, the following corrections are needed:

Great Lakes Airlines ceased operations on March 26, 2018. This airline and its aircraft need to be excluded from the 2028 DDFS.
https://en.wikipedia.org/wiki/Great_Lakes_Airlines

Virgin America was merged into Alaska Airlines on April 24, 2018. Alaska retained some of the Virgin America Airbus A320 series fleet. Was the Virgin America A321 fleet to be retained by Alaska Airlines considered in the 2028 DDFS?
https://en.wikipedia.org/wiki/Virgin_America
https://en.wikipedia.org/wiki/Alaska_Airlines#Fleet

Horizon Air is not listed. Horizon Air is a sister company to Alaska Airlines. Was the Horizon fleet considered in the 2018 DDFS and 2028 DDFS?
https://en.wikipedia.org/wiki/Horizon_Air

Viva Aerobus is not listed. Viva Aerobus began operations at LAX on December 12, 2017. Was the Viva Aerobus A320 fleet considered in the 2018 DDFS and 2028 DDFS?
https://www.lawa.org/news-releases/2017/news-release-200

Response: In this comment, the commenter provides a series of comments and questions regarding airlines operating at Terminal 6 and suggests that Table 2-2 in Appendix B.2 of the Draft EIR should be updated. As discussed in Response to Comment ATMP-PC038-107, the list of airlines in Table 2-2 is "representative of anticipated airline locations in the future"; it is not intended to provide a static list of existing or future airlines, and the analysis expressly recognizes that "commercial passenger airlines may start or cease service at LAX, or relocate to different terminals before FY 2028." Therefore, it is not necessary to update the list to account for individual airline fleet or service changes.

Further, Great Lakes Airlines was included in the 2018 baseline schedule and was also retained in the 2028 Design Day Flight Schedule (DDFS). As explained in Response to Comment ATMP-PC038-107, Great Lakes Airlines is a representative airline with a representative fleet accommodating existing and projected passenger demand. Another airline, if not Great Lakes Airlines, could operate these routes. No change to the 2028 DDFS is required.

In response to the commenter's other question, the DDFSs did reflect the merger between Alaska Airlines and Virgin America and their combined fleet and did include flights operated by Horizon Air on behalf of Alaska Airlines, using the Bombardier Q400 aircraft.

Viva Aerobus was not included in the 2018 baseline DDFS, because it did not operate on the day selected in the 2018 flight schedule. However, during the process of reviewing airlines anticipated to provide service to LAX in the 2028 DDFS, LAWA's aviation experts projected that Viva Aerobus would operate on a Peak Month Average Day (PMAD) in 2028 at LAX and were therefore included in the 2028 PMAD schedule.

ATMP-PC038-110

Comment: For the Tom Bradley International Terminal, the following corrections are needed:

Aerolitoral, also known as Aeromexico Connect, is not listed. Aerolitoral is a subsidiary of Aeromexico. Was the Aerolitoral fleet considered in the 2018 DDFS and 2028 DDFS as a part of Aeromexico's fleet?
https://en.wikipedia.org/wiki/Aeroméxico_Connect

Air Berlin ceased operations on October 27, 2017. This airline and its Airbus A330 aircraft needs to be excluded from the 2018 DDFS and 2028 DDFS.
Wikipedia article:
https://en.wikipedia.org/wiki/Air_Berlin
Reuters October 27, 2017 article on the asset sales of the grounded Air Berlin:
https://www.reuters.com/article/us-air-berlin-m-a-easyjet/easyjet-clinches-parts-of-air-berlin-for-german-expansion-idUKKBN1CW31C?edition-redirect=uk

Asiana is being acquired by Korean Air and therefore Asiana will not exist in 2028. Asiana and its passenger and freighter aircraft needs to be excluded from the 2028 DDFS.
Wikipedia article:
https://en.wikipedia.org/wiki/Asiana_Airlines
Reuters November 15, 2020 article on Korean Air acquisition of Asiana Airlines:
https://www.reuters.com/article/us-asiana-airlines-m-a/korean-air-to-spend-1-6-billion-to-become-asiana-airlines-top-shareholder-idUSKBN27W04W

Finnair is not listed. Finnair resumed flights from Helsinki to LAX on March 31, 2019. Finnair and its Airbus A350 should be added into the 2028 DDFS.
LAWA press release March 20, 2019 announcing Finnair service from Helsinki, Finland to LAX beginning March 31, 2019.
https://www.lawa.org/news-releases/2019/news-release-21

Interjet ceased operations on December 11, 2020. This airline and its Airbus A320 aircraft needs to be excluded from the 2028 DDFS.
https://en.wikipedia.org/wiki/Interjet

LOT Polish Airlines is not listed. LOT began service from Warsaw, Poland to LAX in April 2017. This airline and its Boeing 787 aircraft should be included in the 2018 DDFS and 2028 DDFS.
LAWA Press release October 1, 2016 announcing LOT Polish Airlines 4 times a week service beginning in April 2017:
https://www.lawa.org/news-releases/2016/news-release-43

Norwegian Air ceased all long haul flights on January 14, 2021. This airline and its Boeing 787 aircraft needs to be excluded from the 2028 DDFS.
https://en.wikipedia.org/wiki/Norwegian_Air_Shuttle
"In January 2021, Norwegian and its subsidiaries began to reduce their fleets by handing several aircraft, including long-haul Boeing 787s, back to their respective lessors.[53] On

14 January 2021, Norwegian announced it was ending all long-haul services to focus on a resized European route network.[54][55]"

Scandinavian Airlines System is missing the letter "s" in Airlines. https://en.wikipedia.org/wiki/SAS_Group

Thomas Cook Airlines ceased operations on September 23, 2019. Which division of Thomas Cook was LAWA evaluating in this EIR? Was it Condor? Condor broke away from Thomas Cook and has resumed flight operations in Europe. https://en.wikipedia.org/wiki/Thomas_Cook_Group_Airlines

Turkish Airlines is misidentified as Turkish Airways
https://www.turkishairlines.com WOW Airlines of Iceland ceased operations on March 28, 2019. This airline and Airbus A330 aircraft should be excluded from the 2028 DDFS.
https://en.wikipedia.org/wiki/WOW_air

Response: In this comment, the commenter provides a series of comments and questions regarding airlines operating at Tom Bradley International Terminal and suggests that Table 2-2 in Appendix B.2 of the Draft EIR should be updated. As discussed in Response to Comment ATMP-PC038-107, the list of airlines in Table 2-2 is "representative of anticipated airline locations in the future"; it is not intended to provide a static list of existing or future airlines, and the analysis expressly recognizes that "commercial passenger airlines may start or cease service at LAX, or relocate to different terminals before FY 2028." Therefore, it is not necessary to update the list to account for individual airline fleet or service changes.

In response to the commenter's specific questions:

Aerolitoral was not included in the 2018 baseline or 2028 DDFS because Aerolitoral did not provide daily service to LAX in 2018, and was therefore not included in the list of flights in the schedule pulled to prepare the 2018 DDFS.

Although Air Berlin was included in the 2018 DDFS, it was excluded from the 2028 DDFS to reflect the fact that it ceased operations.

The announcement of the merger of Asiana Airlines and Korean Air was made in 2020, after the DDFSs were prepared in 2019.

Finnair was not included in the 2018 baseline or 2028 DDFS because Finnair was not included in the list of flights in the schedule obtained to prepare the 2018 DDFS.

Interjet ceased operations after the DDFSs were prepared in 2019, and was therefore included in the 2018 and 2028 DDFSs.

LOT Polish was not included in the 2018 baseline or 2028 DDFS because LOT Polish did not provide daily service to LAX in 2018, and was therefore not included in the list of flights in the schedule obtained to prepare the 2018 DDFS.

Norwegian Air ceased operations in 2021, after the DDFSs were prepared in 2019, and was therefore included in the 2018 and 2028 DDFSs.

Thomas Cook Airlines ceased operations after the DDFSs were prepared in 2019, and was therefore included in the 2018 and 2028 DDFSs.

WOW Airlines ceased operations in 2021, after the DDFSs were prepared in 2019, and was therefore included in the 2018 and 2028 DDFSs.

The misspelling of "Airlines" (in Scandinavian Airlines System) and the use of "Airways" instead of "Airlines" for Turkish Airlines in Table 2-2 of Appendix B.2 of the Draft EIR are noted.

Regarding all the commenter's comments discussed above, please see Response to Comment ATMP-PC038-107 for discussion regarding the fact that the DDFSs prepared for the purposes of the Draft EIR technical analyses are representative of expected aircraft activity at LAX in the future.

ATMP-PC038-111

Comment: 17. Transportation (Main document and Appendix G)

OVERALL COMMENT ON TRANSPORTATION SECTION OF DEIR

A tremendous quantity of data is presented in the ATMP DEIR in 65 pages in the main document and 748 pages in Appendix G. Unfortunately, there is very little actual information. An estimate of magnitude of transportation growth though 2028 in terms of VMT (Vehicle Miles Traveled) is presented without regard to whether the highway/street network has the capacity to deal with that growth.

Response: As described on page 4.8-18 of the Draft EIR, regulatory changes at the State level have resulted in the "elimination of auto delay, LOS, and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts for land use projects and plans in California." Please see Topical Response TR-ATMP-T-1 regarding CEQA transportation analysis requirements. Notwithstanding this consideration, the freeway safety analysis described in Section 4.8.2.4.2 and Section 4.8.5.5.1 of the Draft EIR used capacity analysis to calculate vehicle queue lengths at freeway off-ramps and determined that the proposed Project would not have a negative effect on traffic safety.

ATMP-PC038-112

Comment: USE OF VMT

The DEIR notes the state CEQA requirement for the use of VMT (Vehicle Miles Traveled). A critical consideration with respect to the DEIR is that translation from traffic counts, cell-phone information, etc., to VMT is done only at the final total gross level at the very

end for both the employee category and the passenger category with no explanation of how that translation is done nor impacts along the timeline in between. The data for employees is presented as VMT per employee, but for passengers, not VMT per passenger.

The different presentations of employee VMT versus passenger VMT is misleading and disguises the large relative magnitude of employee VMT. In the following tables data are presented in VMT per category so direct comparisons can be made.

With respect to the passenger segment of the VMT, the basis for the calculations of VMT from passenger load is not specified. Also, there is no presentation of traffic growth versus MAP.

Response: The commenter asserts that the VMT "translation from traffic counts, cell-phone information, etc., to VMT is done only at the final total gross level at the very end for both the employee category and the passenger category with no explanation of how that translation is done…" This assertion is incorrect. As stated in Section 4.8.2.2.1 under the heading "Model Calibration and Validation," a Project-specific model was calibrated and validated in accordance with industry best practices by adjusting model parameters until model estimated traffic volumes closely match observed traffic volume counts. To obtain the most current and accurate information about trip lengths for passengers and employees, both cell phone and mobile device Global Positioning System (GPS) data (commonly referred to as "Big Data") were used extensively during the calibration and validation process to better reflect observed VMT.

The commenter also asserts that the different presentations of employee VMT versus passenger VMT are misleading and further asserts that the basis for the calculations of VMT from the passenger loads are not specified. This assertion is incorrect. As stated in 4.8.2.2.3, Methodology for Assessing VMT Impacts, a Project-specific methodology was developed by LAWA in consultation with the City of Los Angeles Department of Transportation (LADOT) to address the unique VMT characteristics of the Project. Because the vast majority of the VMT associated with LAX is generated by passengers, separate methodologies were developed for evaluating VMT associated with each of these users. The Daily VMT per Employee metric is consistent with the approach recommended by the Governor's Office of Planning and Research (OPR)[1] and the local LADOT Transportation Assessment Guidelines (TAG)[2] for assessing employee VMT. In particular, OPR's guidance recommends using an "efficiency metric," rather than a fixed, quantitative threshold, for purposes of determining whether employee-related VMT will be significant. As stated in OPR's guidance, "OPR recommends that a per capita or per employee VMT that is fifteen percent below that of existing development may be a reasonable threshold." [3] That is the threshold used in the Draft EIR. See Draft EIR Threshold 4.8-2. It should be noted that LADOT indicated in their comment letter on the Draft EIR that "The transportation impact analysis and thresholds established for this project are consistent with State guidance and the changes to CEQA related to Senate Bill 743." (see comment ATMP-AL009-2).

Neither OPR nor LADOT have provided a recommended threshold for VMT generated by airport passengers, or for a land-use category analogous to airport passengers. OPR

instead recommends that lead agencies develop thresholds for such projects taking into account the general guidance set forth in Public Resources Code Section 21099 and in State CEQA Guidelines addressing thresholds of significance (e.g. State CEQA Guidelines Section 15064.7).[4] The Daily Passenger VMT metric was developed in the absence of a recommended approach by OPR or LADOT for airport passengers, but was discussed and coordinated with LADOT. The assessment of passenger VMT differs from employee VMT in that LAX is considered a regional serving land use and, as such, it includes passenger trips from beyond Los Angeles County. Thus, in accordance with the LADOT TAG guidance for regional serving venues, it is appropriate to analyze employees differently than the passengers because their travel choices and the available travel demand management strategies are dramatically different for these two groups. More specifically, the LADOT TAG states that: "For regional serving projects including retail projects, entertainment projects, and/or event centers, the project would result in a net increase in VMT." The main difference between the employee trips and passengers are that a large amount of the passenger trips are discretionary.

The commenter further asserts that there is no presentation of traffic growth versus million annual passengers (MAP). As described in Response to Comment ATMP-PC035-53 and explained in detail in Chapter 2 of the Draft EIR, the proposed Project would not generate any new passenger- or cargo-related trips. The increase in trips between the 2028 No Project and 2028 With Project scenarios are due to the increase in 4,700 employees. The passenger activity level of 110.8 MAP projected for LAX in 2028 is within the growth level forecast of the 2020-2045 RTP/SCS[5] and it is the same for both projected future baseline conditions (2028) and proposed Project conditions.

[1] State of California, Governor's Office of Planning and Research, Technical Advisory on Evaluating Transportation Impacts in CEQA, December 2018. Available: http://www.opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf.
[2] City of Los Angeles, Department of Transportation, Los Angeles Department of Transportation (LADOT) Transportation Assessment Guidelines, July 2019.
[3] State of California, Governor's Office of Planning and Research, Technical Advisory on Evaluating Transportation Impacts in CEQA, December 2018. Available: http://www.opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf.
[4] State of California, Governor's Office of Planning and Research, Technical Advisory on Evaluating Transportation Impacts in CEQA, page 17, December 2018. Available: http://www.opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf.[5] Southern California Association of Governments, Connect SoCal: The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments, adopted September 3, 2020. Available: https://www.connectsocal.org/Documents/Adopted/0903fConnectSoCal-Plan.pdf.

ATMP-PC038-113

Comment:

TABLES OF VMT DATA

TOTAL VMT				
	2018 Base/Existing	2028 Projected without Project	2028 Projected with Project	Incremental VMT
Employee*	459,900,000	438,000,000	479,792,500	19,892,500
Passenger	6,581,811	8,676,209	8,708,995	2,127,184
Total	466,481,811	446,676,209	488,501,495	22,019,684
% Passengers	1.41%	1.94%	1.78%	

*See Employee VMT Calculation Table

VMT Employee Calculation			
	2018 Base/Existing	2028 Projected without Project	2028 Projected with Project
VMT per Employee	25.2	24	23.9
Number of Employees	50,000	50,000	55,000
Subtotal per Day	1,260,000	1,200,000	1,314,500
Days per Year	365	365	365
Total per Year	459,900,000	438,000,000	479,792,500

Daily Combined VMT	
2018	1,278,030
2028	1,338,360

Although the VMT per Employee droppings from 25.2 in 2019 to 23.9 in 2028 due to mitigations is helpful, the 5.4% decrease could easily be negated by the fact that due to housing trends in the Los Angeles area, employees are likely on the average to move further away from LAX.

Response: The commenter prepared three tables of VMT data; one labeled Total VMT, a second labeled VMT Employee Calculation, and a third labeled Daily Combined VMT. The commenter's calculations and assumptions are incorrect.

In the first table, the commenter incorrectly calculates annual employee VMT by assuming that all 50,000 employees work every day.

The commenter also includes a column called "Incremental VMT" in the first table comparing growth from 2018 to 2028 and disregards the discussion in Section 4.8.3.3.1 of the Draft EIR which states "by the time the proposed Project is completed in 2028, Phase 1 of the LAX Landside Access Modernization Program, including the APM, ITF East, ITF West, CONRAC, and Phase 1 roadways will be completed. Metro's Crenshaw/LAX Line and AMC 96th Street Transit Station will also be completed, including an interface

between the station and the LAX Landside Access Modernization Program facilities. These improvements will substantially change the surface transportation characteristics around the airport, including VMT. As described in Section 4.8.1, for these reasons, Projected Future Conditions in 2028 serve as the baseline for evaluating the transportation impacts of the proposed Project." As such, the "Incremental VMT" presented in the table does not account for the VMT reduction benefits associated with the aforementioned improvements that would occur irrespective of the proposed Project.

In the second table, the commenter incorrectly presents daily employee VMT on a peak day of a peak month; thus, the calculation provided grossly over-exaggerates annual employee generated VMT. The 50,000 employees are total LAWA badged employees for all shifts. Many of them are specialty workers that may go to the airport as needed for only few times a month.

The commenter asserts that the employee VMT reduction due to mitigation could easily be negated by the fact that due to housing trends in the Los Angeles area, employees are likely on the average to move farther away from LAX. The commenter does not provide any information or evidence in support of that assertion. Notwithstanding, it would be speculative to attempt to predict housing supply and cost of housing beyond what is assumed in the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which is what the transportation analysis in Section 4.8 of the Draft EIR is based on with additional corroboration of trip origins-destinations provided by GPS and cellular phone data, as well as employee zip code information. (See Section 4.8.2.2.1 of the Draft EIR).

In the third table, the commenter divides their estimate of total annual combined VMT (from commenter's first table "Total VMT") by 365 days to get an estimate combined daily VMT. This is inaccurate as it is based on assumptions from commenter's "Total VMT" table that involves a combination of daily passenger VMT with the commenter's annual estimate of employee VMT.

In summary, the values presented in these three tables prepared by the commenter are not representative of airport-related VMT, whereas the VMT tables and associated narrative discussions presented in Section 4.8 of the Draft EIR are representative of airport-related VMT, as supported by the substantial evidence provided therein and in Appendix G of the Draft EIR.

ATMP-PC038-114

Comment: INDUCED VMT

Induced travel is a term used to describe how travel demand responds to roadway capacity expansion. The DEIR presents:

INDUCED VMT IN PROPOSED PROJECT – 2028	
Short-term	3,306
Long-term	18,220

Response: The commenter states that "[i]nduced travel is a term used to describe how travel demand responds to roadway capacity expansion" and includes a table named Induced VMT in Proposed Project – 2028. This accurately reflects information provided in Table 4.8-10 of the Draft EIR.

ATMP-PC038-115

Comment: MITIGATIONS
MITIGATION MEASURES
The DEIR lists both primary strategies and additional strategies. Primary Strategies include:

➢Expand LAWA's Rideshare Program (projected increase in vanpool mode share for LAX employees of 7.9 percent)

➢Formalize Employee Telecommuting Program (estimated to decrease over 7,000 daily employee VMT)

➢Provide On-demand Micro-Transit Shuttle (estimated to decrease over 4,700 daily employee VMT)

➢Market and Promote Alternative Transportation Options (opportunity; LAX does not currently engage in comprehensive marketing and promotions for alternative options to get to and from LAX using modes other than a private vehicle—details not specified)

Additional Strategies include: Conduct Parking Study to Price Parking to Reduce VMT, Expand Incentives and Commuter Benefits, Evaluate Modifications to FlyAway Service, Explore Incentive Measures from LAWA Mobility Strategic Plan, and Evaluate the Potential for Congestion Pricing in the CTA. No estimated of such mitigations were given.

Response: The commenter is mostly reiterating the list of VMT reduction strategies included in MM-T (ATMP)-1 VMT Reduction Program of the Draft EIR; however, it is unclear as to what is meant by the concluding sentence "No estimated [sic] of such mitigations were given." Nevertheless, please see Topical Response TR-ATMP-T-2 for additional information regarding VMT mitigation measures and monitoring for the LAX Airfield and Terminal Modernization Project.

ATMP-PC038-116

Comment: ANTICIPATED RESULTS OF MITIGATION

Ability of Strategies to Mitigate Employment VMT Impact (with Project, 2018 to 2028 employee VMT reduced from 25.2 to 23.9 per day which is 71,500 per day for 55,000 employees, a reduction of 5.44%).

Ability of Strategies to Mitigate Passenger VMT Impact (estimated at 32,786 VMT per day).

Ability of Strategies to Mitigate Induced VMT Impact (induced travel is a term used to describe how travel demand responds to roadway capacity expansion). The DEIR states "… an induced demand elasticity factor of 1.0319 was applied to estimate long-term VMT, meaning that every percent increase in lane miles would result in a 1.03 percent increase in vehicle travel." No potentially feasible mitigation measured was identified.

Summary of Mitigation Results:

Daily Mitigation of VMT

Mitigation Employees	71,500
Mitigation Passengers	32,786
	104,286
Total Daily VMT	1,314,500
% Estimated Decrease	7.93%

Note that in 2028 with the Project, employees generate 68.6% of the VMT reduction (71,500/104,286) while representing 98.2% of total VMT (479,792,500/488,501,495). As noted in the DEIR, Employee VMT is under more control of LAWA.

While there are transportation-related mitigations along the way, the lack of categorizations of VMT over the timeframe considered in the DEIR nor mitigations related to those categorizations is a key deficiency.

Response: The commenter is incorrect that the lack of VMT categorizations and related mitigation is a deficiency in the Draft EIR. The information in the commenter's table ("Daily Mitigation of VMT") is also related to calculations contained within comment ATMP-PC038-113. Please refer to Response to Comment ATMP-PC038-113 for a summary of the inaccuracies of these calculations made by the commenter and related assumptions about VMT.

The commenter also mislabels VMT impacts with mitigation (e.g., "Mitigation Passengers" and "Mitigation Employee"). For example, the commenter incorrectly computes employee mitigation by multiplying the estimate of 55,000 LAX employees with the employee VMT efficiency metric of 23.9 to obtain a total daily VMT value. In summary, the Draft EIR does not mis-categorize the VMT associated with the proposed

Project or the timeframes for the assessment of impacts. There are also no mis-categorizations of the mitigation measures for employee, passenger, or induced VMT impacts. Please see Topical Response TR-ATMP-T-2 regarding VMT mitigation measures and monitoring for the LAX Airfield and Terminal Modernization Project.

ATMP-PC038-117

Comment: INADEQUATE PRESENTATION OF MODELING

The actual model underlying the calculations is never presented, only some vague references to VMT validation methodology in the Main ATMP DEIR document and section G.6 (e.g., page G.6-3) of Appendix G.

Response: The Project Travel Demand Model developed by LAWA for the purposes of assessing VMT and transportation impacts of the proposed Project was prepared in accordance with the state of the professional practice for developing travel models. This model tiers off the City of Los Angeles travel demand model that previously undertook an extensive calibration/validation exercise. The LADOT Transportation Assessment Guidelines[1] recommends using this model as the best available tool to evaluate the VMT impacts of large projects.

As discussed on pages 4.8-4 through 4.8-6 of Section 4.8.2.2 of the Draft EIR, details on the Project Travel Demand Model structure, inputs, calibration and validation, and outputs are provided to the reader. These details explain how the model was both developed and applied to the proposed Project. Appendix G.6 provides additional technical data on the Project Travel Demand Model along with model validation statistics demonstrating the model's suitability for assessing VMT attributable to the proposed Project.

[1] City of Los Angeles, Department of Transportation, Los Angeles Department of Transportation (LADOT) Transportation Assessment Guidelines, July 2019. Available: http://ladot.lacity.org/sites/default/files/documents/ta_guidelines_-20190731_0.pdf.

ATMP-PC038-118

Comment: DEIR ANALYSIS MISSES THE MARK: QUESTION OF WHETHER TRAFFIC CAN BE ACCOMMODATED WITH OR WITHOUT THE PROJECT

The DEIR does not address the question of whether even without the proposed project whether the resultant traffic could be accommodated.

Note that the DEIR saying that project will add 5.8 lane miles increased length of travel in some cases (0.0062% increase) will not add parallelism needed for increased traffic capacity.

Response: As discussed in Section 6.3.2 of the Draft EIR, the forecast growth in passenger activity and aircraft operations by 2028 will occur with or without the proposed Project. As described on page 4.8-18 of the Draft EIR, regulatory changes at the State level have resulted in the "elimination of auto delay, LOS, and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts for land use projects and plans in California." Please see Topical Response TR-ATMP-T-1 regarding CEQA transportation analysis requirements. For this reason, extensive roadway capacity analysis was not conducted as part of the Draft EIR. Notwithstanding this consideration, the freeway safety analysis described in Section 4.8.2.4.2 and Section 4.8.5.5.1 of the Draft EIR used capacity analysis to calculate vehicle queue lengths at freeway off-ramps and determined that the proposed Project would not have a negative effect on traffic safety.

ATMP-PC038-119

Comment: PROBLEM A WITH DRAFT DEIR PROJECTION

Noting that the employee VMT will only increase slightly (459,900,000 to 479,792,500) an increase of 4.3% and say is essentially flat and a constant in the analysis of increased ground traffic, traffic growth would be related to passenger VMT growth. The increase projected is 32.3%. While this increase is for a relatively small component of the overall VMT relative to Employee VMT, even now passenger-related traffic (particularly present during holidays) is problematic.

It is not clear how an increase of 32.5% can be accommodated (or in 2028 even without the Project).

Response: The commenter asserts that employee VMT would only increase slightly but passenger VMT is projected in to increase by 32.3 percent. This is an incorrect calculation. The passenger VMT is shown in Table 4.8-14 of the Draft EIR as follows: 2019 Existing Conditions is 6,581,811 VMT; Projected Future Conditions Baseline (2028) is 8,676,209 VMT; and the 2028 Proposed Project is 8,708,995 VMT. The increase from 2019 Existing Conditions to the 2028 Proposed Project conditions is 24.4 percent. As further explained, the more meaningful and appropriate comparison of the proposed Project's effect on VMT is the comparison of the 2028 Baseline and 2028 Project due to the extensive transportation network improvements, which indicates a VMT increase of 0.3 percent.

ATMP-PC038-120

Comment: PROBLEM B WITH DRAFT DEIR PROJECTION

The DEIR projects an increase from 2018 VMT total of 466,482,822 to 2028 VMT 488,501,495, an increase of 4.7%. Based on the ARSAC (Alliance for a Regional Solution to Airport Congestion) Ground Transportation Model presented to LAWA in the fall of 2017, the LAX data for CTA traffic showed an average annual increase in ground traffic

from 2012 to 2016 of 6%. The average increase in MAP was 5.51%, roughly correlated with CTA traffic.

The projected MAP growth from 2018 to 2028 is projected from 84.5 to 110.8. This is an annual growth rate of 2.7%. Since the growth in ground traffic is roughly correlated to MAP, applying the 2.7% to ground traffic, the projected 2028 VMT would be 608,890,433 not the 488,501,495 projected in the DEIR model. This a 24.6% difference. In answer to a rebuttal that Employee VMT goes up slightly (459,900,000 to 479,792,500) an increase of 4.3%, the number of employees in the 2012-2016 likely did not change radically and yet the growth of ground traffic corelated with MAP. This is even more interesting because although the ARSAC model dealt with CTA traffic, the LAMP Intermodal Transfer Facility and CONRAC are replacement areas of concentration with the additional potential bottleneck of the APM.

It is not clear how a 2028 VMT of 608,890 can be accommodated (or in 2028 even without the Project).!

Response: The commenter asserts that "[t]he DEIR projects an increase from 2018 VMT total of 466,482,822 to 2028 VMT 488,501,495, an increase of 4.7%." The calculations discussed by the commenter are not from the Draft EIR and the commenter provides no factual information supporting the basis of the calculations. Please refer to Responses to Comments ATMP-PC038-116 to ATMP-PC038-119 describing the errors in the assumptions underlying the commenter's calculations.

As shown in Table 4.8-14 of the Draft EIR, estimate for total Passenger VMT in 2019 and Projected Future Conditions Baseline (2028) are 6,581,811 and 8,676,209 respectively. This is an average of 3.5 percent per year. During this period, the Million Annual Passengers (MAP) is projected to increase from 88.1 to 110.8, an average of 2.9 percent per year.

The commenter also assumes, incorrectly, that the growth in MAP and growth in ground traffic in the CTA is directly corelated to the growth in employee VMT. The methodology for calculating employee VMT is described in Section 4.8.2.2 of the Draft EIR. Employee VMT is the sum of all miles traveled between the employee's place of residence and LAX. It is heavily influenced by LAWA's Travel Demand Management (TDM) strategies and home location of employees. In any case, the amount of employee VMT is not directly related to MAP or to the amount of traffic in the CTA.

ATMP-PC038-121

Comment: 18. Appendix H Water Supply Assessment

Comments and Questions:
On page 2 of the March 5, 2020 letter to Los Angeles Department of Water & Power, LAWA proposes using ENERGY STAR certified residential dishwashers for water conservation.

1. Why is a residential dishwasher being used as a standard for a commercial environment such as LAX? Usually, restaurants will have commercial dishwashing equipment that can handle far greater volumes of plates, cups, glasses, utensils, etc. than a residential dishwasher.
2. Are there no ENERGY STAR rated commercial dishwashers available today?

Response: LAWA is not proposing the use of any specific appliances at this time. The March 5, 2020 letter to the Los Angeles Department of Water and Power (LADWP) was prepared for the purpose of requesting that LADWP prepare a Water Supply Assessment (WSA) for the LAX Airfield and Terminal Modernization Project. (LADWP's Water Supply Assessment is provided in Appendix H of the Draft EIR; LAWA's letter to LADWP is include as Appendix B of LADWP's Water Supply Assessment.) The letter contains a description of the proposed Project size, uses, and features for LADWP to use in preparing the WSA. The letter included a list of voluntary water conservation measures, among them the use of ENERGY STAR residential dishwashers, that LAWA has committed to which go above and beyond those required by City of Los Angeles codes and ordinances. The proposed Project is currently at a preliminary design level of planning sufficient for evaluating the potential environmental impacts. Detailed information regarding the specific appliances to be used at Concourse 0 and Terminal 9, including whether dishwashers would be residential dishwashers or commercial dishwashers, would be determined during Project-specific design and implementation.

LADWP prepared the WSA in accordance with state law as set forth in California State Water Code Sections 10910-10915. Table I on page 8 of the WSA details the base water demand and anticipated water savings that would occur as a result of compliance with existing City of Los Angeles codes and ordinances; Table II on page 9 of the WSA details the anticipated water savings that would occur with the addition of LAWA's voluntary water conservation measures. As shown in Table II, LADWP did not factor in any water savings that might occur as a result of using ENERGY STAR dishwashers. Even without consideration of the use of ENERGY STAR residential dishwashers, LADWP concluded that adequate water supplies would be available to meet the total additional water demand of 95 acre-feet annually for the Project. Because LADWP did not factor in any water savings into its calculations from ENERGY STAR dishwashers, the calculation of Project-related water consumption shown in Table I of the WSA was conservative and likely overestimates actual Project-related water demand. Since LADWP found that adequate water supplies would be available without considering the use of ENERGY STAR residential dishwashers, adequate water supplies would be available if the Project were to consume less water.

ATMP-PC039	**Gerez, Paula**	**Neighborhood Council of Westchester Playa (NCWP)**	**1/12/2021**

ATMP-PC039-1

Comment: The Neighborhood Council of Westchester Playa would like to formally request an additional 60-day extension for comments to the LAWA ATMP DEIR. The current deadline is February 12, 2020 and this requested extension would move the deadline to April 12,2020.

The complexity and size of the document (over 10,000 pages) warrants more time. The impact of the project on Air Quality, Greenhouse Gas Emissions, Noise and Transportation/Traffic will result in "Significant Unavoidable Impacts" and as such we have requested from the LADOT and the Planning Department help in reviewing the data.

We are awaiting input from the DOT and Planning and do not anticipate it in time for us to evaluate the input and make a timely recommendation to the Board in order to meet the current DEIR deadline of February 12, 2020.

Further, a non-CEQA review between LAWA and LADOT is in the works and may shed more light on potential additional mitigation strategies to reduce the project's negative impact on transportation traffic to the community.

Response: On October 29, 2020, LAWA published the Draft EIR for the proposed LAX Airfield and Terminal Modernization Project. In accordance with the State CEQA Guidelines, the Draft EIR was originally circulated for public review for 47 days (two days more than the required minimum 45 days), with the review period originally closing on December 14, 2020. A virtual open house was launched on November 25, 2020 that provided detailed information about the proposed LAX Airfield and Terminal Modernization Project and the Draft EIR analysis. LAWA also held a virtual public meeting on December 1, 2020 that provided stakeholders with a presentation on the proposed Project and the Draft EIR analysis, as well as an opportunity for questions and answers. The comment period for the Draft EIR was extended twice due to requests from the community and neighboring jurisdictions, including ARSAC. It was initially extended by 60 days to February 12, 2021, and then extended again for an additional 31 days, for a total comment period of 138 days, with the comment period closing on March 15, 2021. LAWA determined that the two extensions of the comment review period, which resulted in a comment period that was more than triple the review time required by CEQA, coupled with the virtual open house and virtual public meeting described above, provided adequate time and information for public review of the Draft EIR. Please see Topical Response TR-ATMP-T-1 regarding the assessment of transportation effects associated with the LAX Airfield and Terminal Modernization Project that are not subject to CEQA, which was conducted in accordance with the City of Los Angeles Transportation Assessment Guidelines.

ATMP-PC040 Sisson, Jordan R. Law Office of Gideon Kracov 1/12/2021

ATMP-PC040-1

Comment: It seems the Draft EIR is missing CalEEMod output files. For example, while it appears the Project relied upon CalEEMod for some aspects of the Project (e.g., energy demand associated with Terminal 9 parking [DEIR, p. 4.3-2]), only some of the CalEEMod assumptions are disclosed (e.g., land use type, size inputs, emissions estimates [Appendix C, PDF page 524])—and the CalEEMod output files are entirely missing. Hence, I am requesting all CalEEMod output files relied upon in the Draft EIR.

Please let me know if you have any questions regarding this request. Also, please confirm receipt of this message—many thanks.

Response: The Draft EIR was not missing any relevant California Emissions Estimator Model (CalEEMod) output data. CalEEMod was only used to model a portion of the operational stationary source emissions associated with Terminal 9 and Concourse 0 (specifically, emissions relating to natural gas usage, architectural coatings, consumer products, landscaping, water usage, and solid waste generation). Regardless of this fact, CalEEMod automatically generates detailed output files for all aspects of construction and operations. Much of the data generated by CalEEMod were not used in the Draft EIR. Therefore, Appendix C of the Draft EIR included a summary of the applicable portions of the output files. This is consistent with CEQA, which does not require an EIR to include the type of highly technical data contained in the CalEEMod output files. "The ultimate inquiry, as case law and the CEQA guidelines make clear, is whether the EIR includes enough detail 'to enable those who did not participate in its preparation to understand and to consider meaningfully the issues raised by the proposed project.'" (*Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 516, quoting *Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 405.) Here, the Draft EIR includes detailed analysis of the proposed Project impacts to air quality and energy in Sections 4.1.1 and 4.3, respectively. This analysis is supported by approximately 1,272 pages of technical information included in Appendix C of the Draft EIR. This information satisfies CEQA's requirements for meaningful analysis and inclusion of technical detail.

Nevertheless, in response to this request from the commenter, LAWA provided the original applicable CalEEMod output files to the commenter on January 20, 2021. Provision of these data merely amplified information already included in the Draft EIR and does not amount to significant new information that would require recirculation of the Draft EIR.

It should also be noted that the Draft EIR did not rely on CalEEMod to model energy demand associated with the Terminal 9 parking facility, as stated by the commenter. Rather, as detailed in Note 2 of Table 4.3-3 on page 4.3-15 in Section 4.3 of the Draft EIR, the Draft EIR only used a demand factor for energy use from CalEEMod. This demand factor was applied to the parking facility square footage to determine energy consumption; no output files were generated.

The Draft EIR analysis was based on the following CalEEMod assumptions: project location (Los Angeles-South Coast County area), climate zone (11), land use setting (urban), operational year (2028), and utility company (Los Angeles Department of Water & Power). These assumptions are included in the CalEEMod files that were provided to the commenter on January 20, 2021.

F3 CORRECTIONS AND CLARIFICATIONS TO THE DRAFT EIR

F3.1 Introduction

The following revisions are hereby made to the Draft EIR (main document and appendices). Changes in the text are signified by strikeouts where text is removed and shown with italics and underline where text is added. These changes do not add significant new information to the EIR that would require Draft EIR recirculation under State CEQA Guidelines Section 15088.5. For example, they do not disclose or suggest new or substantially more severe significant environmental impacts of the proposed Project, or a new feasible mitigation measure or alternative considerably different than those analyzed in the Draft EIR that would clearly lessen the proposed Project's significant effects.

F3.2 Corrections and Clarifications to the Draft EIR Main Document

Chapter 1, Introduction and Executive Summary

1. As presented in several figures and related text in the Draft EIR, the easternmost runway exit from Runway 6L-24R would have required the relocation of the Runway 24R and Runway 24L Precision Approach Path Indicators (PAPIs). In order to avoid relocating these navigational aids, the runway exit has been moved to the west. In this instance, Figure 1-3 on page 1-7 of the Draft EIR is hereby revised to depict the movement of the easternmost proposed runway exit from Runway 6L-24R to the west to avoid the Runway 24R and Runway 24L PAPIs. Please see the following revised figure.

2. The last sentence of the second paragraph on page 1-9 of the Draft EIR is hereby revised. The reason for this revision is to include in the summary of Terminal 9 other related improvements. The revision is as follows:

   > Terminal 9 would require airfield improvements to support the facility, including *construction of an* aircraft parking apron, ~~and t~~*T*axiway *C* improvements *and extension, and relocation of Vehicle Service Road C. Other improvements related to Terminal 9 would include construction of a parking facility and a Terminal 9 APM station (platform), and pedestrian corridors connecting these facilities to the terminal.*

3. The fifth sentence of the last paragraph on page 1-9 of the Draft EIR is hereby revised. The reason for this revision is to further clarify that the three remaining West Remote Gates would continue to be used for regularly-scheduled commercial flights, consistent with the aviation forecast in Appendix B.1 of the Draft EIR. The revision is as follows:

   > The three remaining West Remote Gates would *remain in operation.* ~~be retained to provide operational flexibility, such as for intermittent use if needed during peak surges in activity, if several CTA gates are out of service for maintenance, or for special flights requiring additional security and special logistics (e.g., Air Force One).~~

4. For reasons explained in the introduction to Section 4.1.1, Air Quality, below, the Impact 4.1.1-2 summary for Air Quality in Table 1-2 page 1-14 of the Draft EIR is hereby revised as follows:

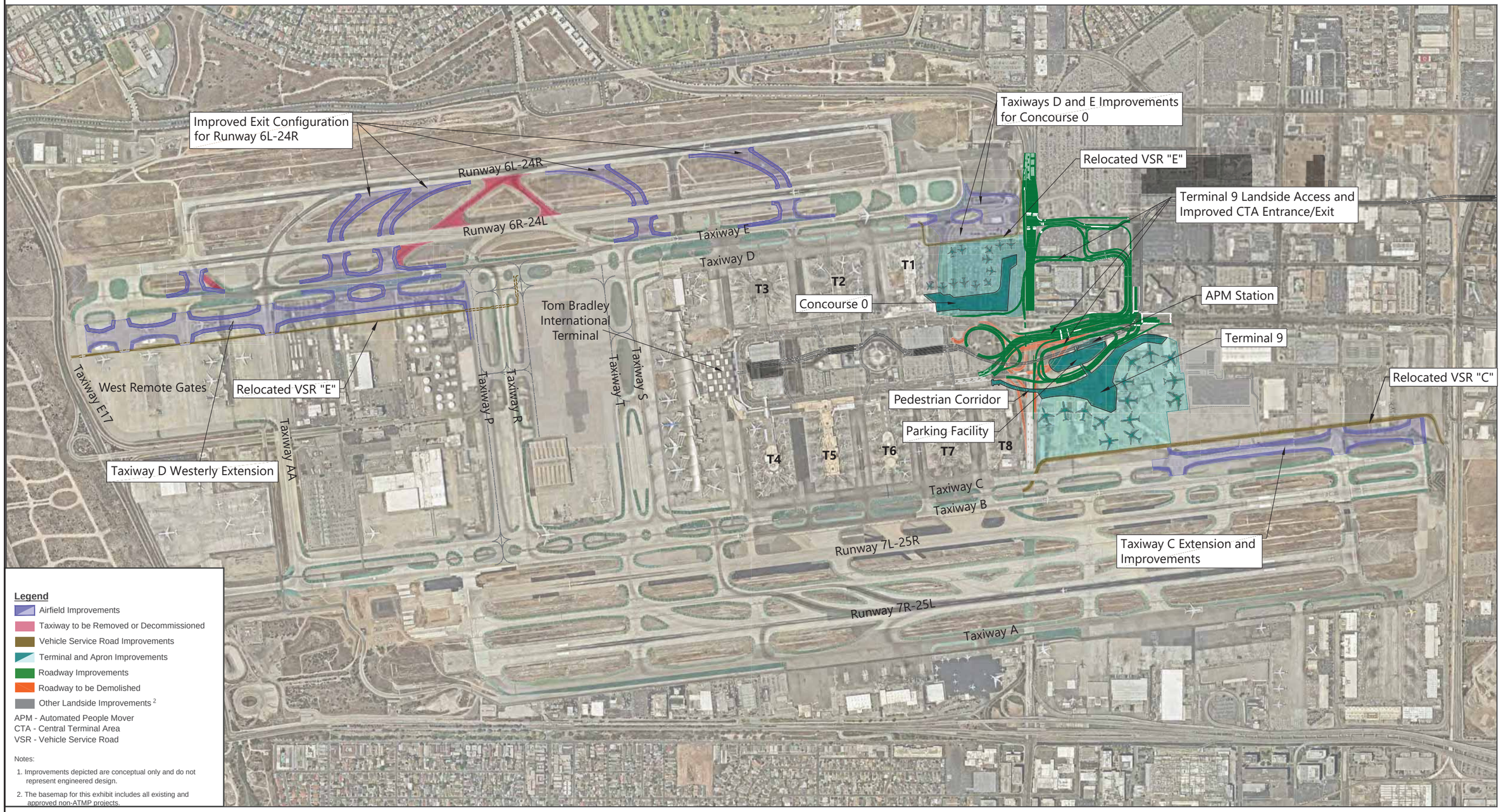
Table 1-2
Summary of Potential Impacts and Mitigation Measures Associated with the Proposed Project

Environmental Impacts	Impact Determination	Mitigation Measures	Level of Significance After Mitigation
Air Quality			
Impact 4.1.1-2: Operation of the proposed Project would result in estimated incremental increases in operations-related emissions that are greater than the daily mass emission thresholds established by SCAQMD. This would be a ***significant and unavoidable impact*** for operations***.***	Construction: Not Applicable Operations: Significant (NO_X, SO_X, PM_{10}~~, $PM_{2.5}$~~)	Construction: Not Applicable Operations: MM-AQ/GHG (ATMP)-3. Parking Cool Roof. MM-AQ/GHG (ATMP)-4. EV Charging Infrastructure. MM-AQ/GHG (ATMP)-5. Electric Vehicle Purchasing. MM-AQ/GHG (ATMP)-6. Solar Energy Technology. MM-T (ATMP)-1. Vehicle Miles Traveled (VMT) Reduction Program.	Construction: Not Applicable Operations: Significant and Unavoidable (NO_X, SO_X, PM_{10}~~, $PM_{2.5}$~~)

5. For reasons explained in the introduction to Section 4.1.1, Air Quality, below, the text under the heading Air Quality on page 1-24 of the Draft EIR is hereby revised as follows:

Air Quality

- Construction emissions (Project-related and cumulatively considerable contributions) of the following pollutants:
  - Carbon monoxide (CO) (for two 4.5-month periods)
  - Volatile organic compounds (VOC) (for two 4.5-month periods)
  - Nitrogen oxides (NO_X)
  - Sulfur oxides (SO_X) (for two 4.5-month periods)
- Operational emissions (Project-related and cumulatively considerable contributions) of the following pollutants:
  - NO_X
  - SO_X
  - Respirable particulate matter (PM_{10})
  - ~~Fine particulate matter ($PM_{2.5}$)~~
- Operational concentrations (Project-related and cumulatively considerable contributions) of the following pollutants:
  - PM_{10}



Source: Ricondo & Associates, Inc., 2021
Prepared by: CDM Smith,July 2021

LAX Airfield and Terminal Modernization Project

LAX Airfield and Terminal Modernization Project Elements

Figure
1-3

6. Footnote 7 on page 1-26 of the Draft EIR is hereby revised to correct a typographical error, as follows:

> [7] As with the proposed Project, the number of gates for Concourse 0 depends on the size of aircraft (i.e., narrowbody vs. widebody) – see Section 2.4.2.1. Also similar to the proposed Project, the development of Concourse *0* ~~2~~ would remove two existing gates from Terminal 1; hence, the range of net new gates would be 6 to 9.

7. For reasons described in Item 3 under the heading Chapter 1, Introduction and Executive Summary, above, the fifth sentence of the last paragraph on page 1-26 of the Draft EIR is hereby revised as follows:

> At the high end of the range for Terminal 9 (i.e., 18 narrowbody gates), 15 of the 18 West Remote Gates would be removed or decommissioned and, similar to the proposed Project, three of the West Remote Gates would remain *in operation* ~~to provide operational flexibility~~.

8. The eighth and ninth sentences in the last paragraph on page 1-26/first paragraph on page 1-27 of the Draft EIR are hereby revised. The reason for these changes is to make the summary of the Terminal 9 airfield improvements related to Alternative 3 in this chapter consistent with the summary of the Terminal 9 airfield improvements related to the proposed Project, since the improvements would be the same for both scenarios. The revisions are as follows:

> In conjunction with construction of the passenger building and aircraft gates, development of Terminal 9 would include construction of an aircraft parking apron*, Taxiway C improvements and extension,* ~~and a taxilane connecting the terminal to the airfield; relocation and easterly extension of Taxilane C from Taxiway C3 to Taxiway B1;~~ and relocation of Vehicle Service Road C. ~~The relocated vehicle service road would be designed at ADG VI separation from Taxiway C and the relocated/extended Taxilane C would be designed at ADG VI separation from Taxiway B.~~

9. For reasons explained in the introduction to Section 4.1.1, Air Quality, below, the Emissions (Operations) row of the Air Quality section of Table 1-3 on page 1-29 of the Draft EIR is hereby revised as follows:

Table 1-3
Summary Comparison of Impacts Associated with the Proposed Project and Alternatives

Resource Category[1]	Proposed Project (After Mitigation)	Alternative 1: No Project	Alternative 2: Concourse 0 Only	Alternative 3: Terminal 9 Only	Alternative 4: LAMP Roadway Improvements plus Terminal 9 Access
Air Quality and Human Health Risk					
Air Quality					
Emissions (Operations)	Significant and Unavoidable (NO_X, SO_X, PM_{10}, ~~$PM_{2.5}$~~)	Significant and Unavoidable (NO_X, SO_X, PM_{10}, ~~$PM_{2.5}$~~)	Significant and Unavoidable (NO_X, SO_X, PM_{10}, ~~$PM_{2.5}$~~)	Significant and Unavoidable (NO_X, SO_X, PM_{10}, ~~$PM_{2.5}$~~)	Significant and Unavoidable (NO_X, SO_X, PM_{10}, ~~$PM_{2.5}$~~)

10. Because a new subsection has been added to the Draft EIR (see Item 11 below), a new subheading is hereby added to the top of page 1-35 of the Draft EIR as follows:

1.6.1 Main Issues Identified in Comments on the Notice of Preparation

11. For reasons set forth in Response to Comment ATMP-PC038-53, relative to summarizing areas of known controversy that were identified in comments received in the Draft EIR, a new subsection is hereby added after the last paragraph on Page 1-35 of the Draft EIR as follows:

1.6.2 Areas of Controversy Identified in Comments on the Draft EIR

- *COVID-19 Pandemic's Effects – Comments were received asserting that the effects of the COVID-19 pandemic should be accounted for in the Draft EIR relative to whether the feasibility and utility of the proposed Project are still valid.*
- *Impacts Beyond the Horizon Year of 2028 – Comments were received asserting that the impacts analyses that addressed operational impacts in 2028, which is the proposed buildout (i.e., completion) year for the Project, should have evaluated impacts farther into the future, including as far as the year 2045.*
- *Growth Inducement – Comments were received asserting that the improvements associated with the proposed Project, particularly the new terminal facilities (i.e., Concourse 0 and Terminal 9) and the associated new gates for aircraft, would induce additional activity at LAX (i.e., more aircraft flights and more passengers) than would otherwise occur without those improvements.*
- *Aircraft Gates – Comments were received asserting that the Draft EIR's assumptions regarding the availability of existing aircraft gates in the future were inaccurate, particularly as related to the future decommissioning of West Remote Gates.*
- *Transportation Impacts – Comments were received asserting that the Draft EIR should have addressed future traffic congestion around LAX and resultant decreases in the roadway/intersection level of service (i.e., "LOS") and increases in travel delay.*
- *Air Quality and Greenhouse Gas (GHG) Emissions – Comments were received asserting that the impacts analyses related to air quality and GHG were incomplete and/or inaccurate, and that the proposed mitigation measures were incomplete or inadequate.*
- *Noise – Comments were received asserting that the impacts analyses related to aircraft noise (particularly with regard to impacts associated with temporary runway closures), construction noise, and roadway noise were incomplete and/or inaccurate, and that mitigation measures proposed for aircraft noise impacts and construction noise impacts were incomplete or inadequate.*
- *Alternatives – Comments were received asserting that the Draft EIR did not address a reasonable range of alternatives, and disagreeing with the Draft EIR's identification of the environmentally superior alternative.*

Chapter 2, Description of the Proposed Project

1. The fifth and sixth sentences in the second paragraph on page 2-4 of the Draft EIR are hereby revised. The reason for these changes is to accurately identify all the hotels located in proximity to the proposed landside improvements as well as the location of the entrance to LAX. The revisions are as follows:

> The proposed landside improvements would be located in proximity to several hotels (Hyatt Regency Los Angeles, H Hotel/Homewood Suites, ~~and~~ Courtyard by Marriott, *and Sheraton Gateway*), an office building, surface and structured parking facilities, and *a* ~~the~~ Los Angeles Community College District property. Also within the vicinity of the Project site is the entrance to LAX, located at *Century Boulevard/*World Way and Sepulveda Boulevard.

2. For reasons described in Item 1 under the heading Chapter 1, Introduction and Executive Summary, above, Figure 2-4 on page 2-7 of the Draft EIR is hereby revised to depict the movement of the easternmost proposed runway exit from Runway 6L-24R to the west to avoid the Runway 24R and Runway 24L PAPIs. Please see the following revised figure.

3. The first sentence of the first full paragraph on page 2-10 of the Draft EIR is hereby revised. The reason for this change is that, while the elimination of 15 of 18 West Remote Gates would reduce the busing of passengers to these gates, three gates would remain in operation, so busing passengers to and from the West Remote Gates would not be entirely eliminated. The revision is as follows:

> In addition to *reducing* ~~eliminating~~ the inconvenience and inefficiency of busing passengers to and from the West Remote Gates, the development of Concourse 0 and Terminal 9 would provide new facilities with direct access to passenger processing capabilities, including for international travel, and a high-quality of passenger service, which the West Remote Gates do not provide.

4. For reasons described in Item 1 under the heading Chapter 1, Introduction and Executive Summary, above, Figure 2-6 on page 2-13 of the Draft EIR is hereby revised to depict the movement of the easternmost proposed runway exit from Runway 6L-24R to the west to avoid the Runway 24R and Runway 24L PAPIs. Please see the following revised figure.

5. The third paragraph on page 2-20 of the Draft EIR is hereby revised. The reason for this change is to identify the signage and lighting components of the Taxiway D extension element. The revision is as follows:

> As shown on Figure 2-5, the proposed Taxiway D Extension West includes an extension of Taxiway D from Taxiway P to Taxiway E17, and the associated relocation of the westerly portion of Vehicle Service Road E. *In conjunction with the proposed Taxiway D extension, updated signage and lighting would be installed.* FAA design standards for airport runways and taxiways take into consideration the size of aircraft that may be operating on the runway or taxiway relative to providing adequate distance from other aircraft and other movement activity occurring nearby. Aircraft size is defined by the FAA in terms of Airplane Design Group (ADG). Examples of ADG sizes of aircraft that are common to LAX include the Boeing 737 and Airbus A320, which are ADG III; the Boeing 757 and 767, which are ADG IV; the Boeing 747, 777, and 787, which are ADG V; and the Airbus A380, which is ADG VI. The proposed westerly extension of Taxiway D is designed with ADG VI separation from Taxiway E, and the accompanying new vehicle service road proposed south of the Taxiway D extension is designed at ADG VI separation from Taxiway D. The location and design of the proposed taxiway extension would improve airfield operational management by segregating eastbound and westbound taxiing aircraft on Taxiways D and E. With the proposed improvements, ADG VI aircraft could use the Taxiway D

extension instead of Taxiway E to avoid operational restrictions during ADG VI arrival and departure operations on Runway 6R-24L.

6. For reasons described in Item 1 under the heading Chapter 1, Introduction and Executive Summary, above, Figure 2-7 on page 2-21 of the Draft EIR is hereby revised to depict the movement of the easternmost proposed runway exit from Runway 6L-24R to the west to avoid the Runway 24R and Runway 24L PAPIs. Please see the following revised figure.

7. For reasons set forth in Response to Comment ATMP-PC038-3, the last paragraph on page 2-23 of the Draft EIR is hereby revised as follows:

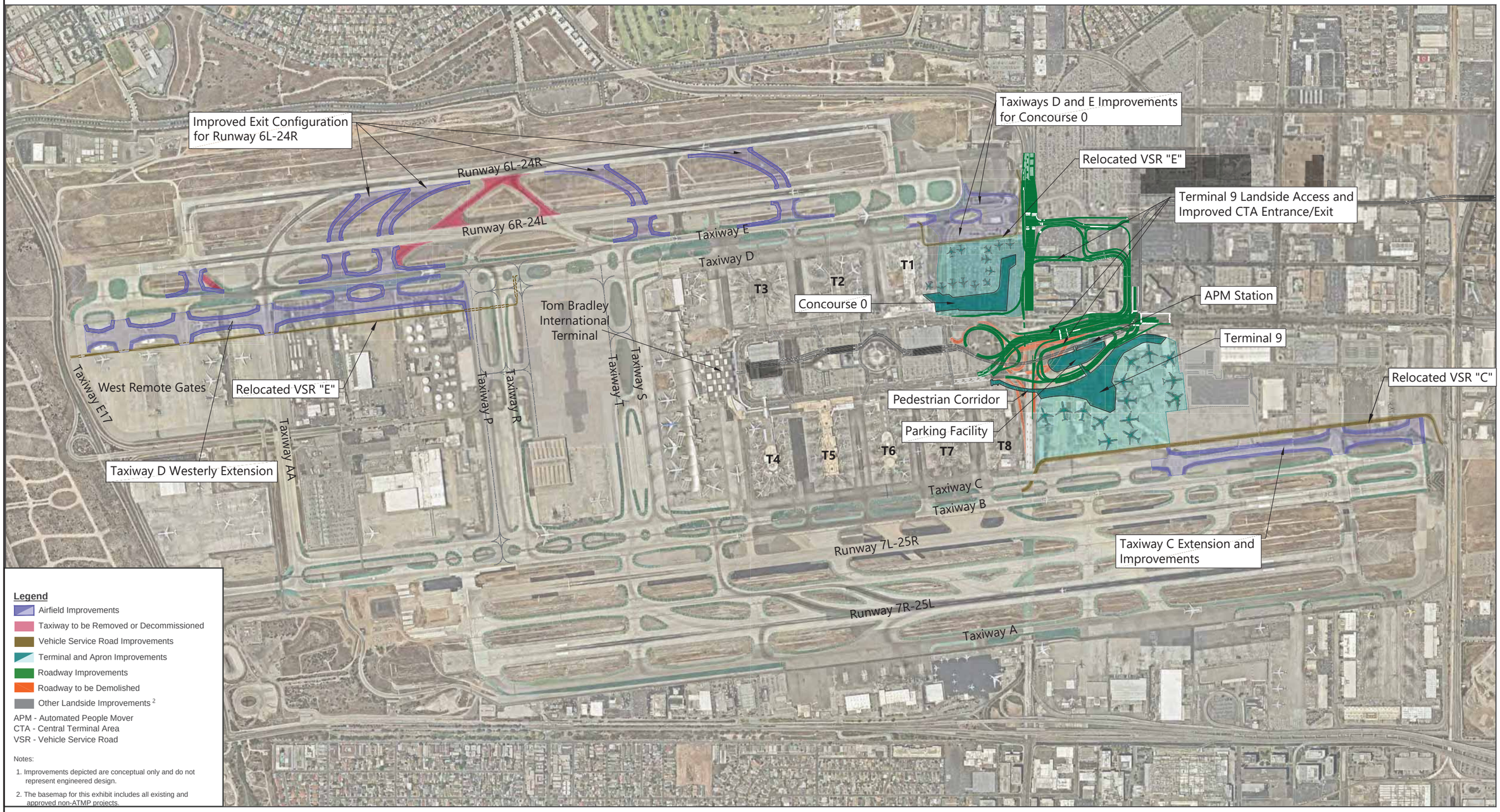
> With regard to runway safety systems in the north airfield, LAWA has installed runway status lights.[12a] *As indicated in Table 3-1 in Chapter 3, the FAA intends to upgrade runway status light components for the north airfield while various runway and taxiway surfaces are closed for construction of the proposed Project (described in Section 2.6.4 below).* Design and construction of the north airfield improvements described above would include integration with the ~~existing~~ *upgraded* runway status lights system, as required by the FAA*, including updated signage and lighting compatible with FAA's updated runway status light system*.

8. The fifth paragraph on page 2-28 of the Draft EIR is hereby revised. The reason for these changes is to clarify the improvements to, and associated with, Taxiway C. The revisions are as follows:

> In addition to the passenger building, Terminal 9 would also include an aircraft parking apron and a taxilane connecting the terminal to the airfield. Other related airfield improvements that would support Terminal 9 include the relocation of Vehicle Service Road C, ~~and the relocation and~~ *the* easterly extension of Taxilane C from Taxiway *F* ~~C3~~ to Taxiway B1*, and improvements to/relocation of Taxiway C between Taxiway C3 and Taxiway F*. *In conjunction with the proposed Taxiway/Taxilane C relocation and extension, updated signage and lighting would be installed.* The relocated vehicle service road would be designed at ADG VI separation from Taxiway C and the relocated/extended Taxilane C would be designed at ADG VI separation from Taxiway B.[16a]

9. A footnote is hereby added to last sentence in the fifth paragraph on page 2-28 of the Draft EIR. The reason for this change is to clarify references to Taxiway C and Taxilane C in the Draft EIR. The new footnote is as follows:

> [16a] *The existing airfield directly north of Runway 7L-25R (located in the South Airfield area) includes Taxiway B, which is immediately north of and parallel to Runway 7L-25R, and Taxiway/Taxilane C, which is immediately north of and parallel to Taxiway B. Per the FAA's Advisory Circular (AC) on Airport Design, a taxiway is a defined path established for the taxiing of aircraft from one part of an airport to another, and a taxilane is a type of taxiway with different dimensional requirements. As such, the taxiway and taxilane designations can be, and are, used interchangeably when describing or depicting the existing state or proposed improvements and extension of Taxiway/Taxilane C. The designation does not indicate a difference in its operational capability (size or volume of aircraft that can be accommodated, jurisdiction of control, etc.). Aircraft up to Airplane Design Group (ADG) VI can operate on the proposed improvements and extension without restrictions (i.e., closure of Taxiway B or vehicle service road). Therefore, designation of the improvement and extension as "Taxiway C" in the EIR is synonymous to Taxilane C.*

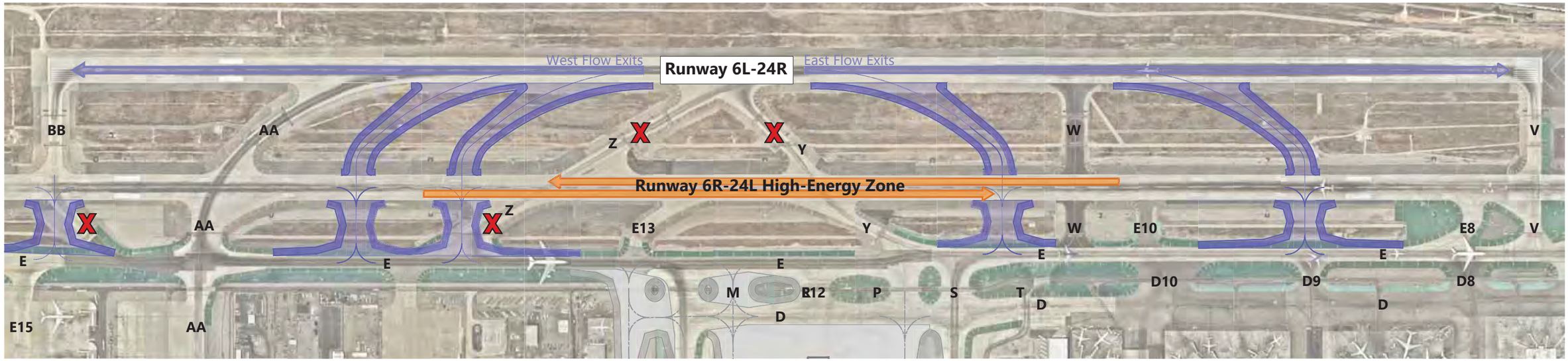


Source: Ricondo & Associates, Inc., 2021
Prepared by: CDM Smith,July 2021

LAX Airfield and Terminal Modernization Project

LAX Airfield and Terminal Modernization Project Elements

Figure
2-4



Legend

- Proposed Airfield and Terminal Modernization Project Airfield Improvement
- Other Airfield Improvement[1]
- X — Removed or Decommissioned Taxiway
- Runway 6R-24L High Energy Zone[2]

Notes

1 Other Airfield improvements (e.g. Taxiway P) are from the Midfield Satellite Concourse Program.
2 Approximate location of the West Flow and East Flow middle-third of the runway based on departure declared distances.

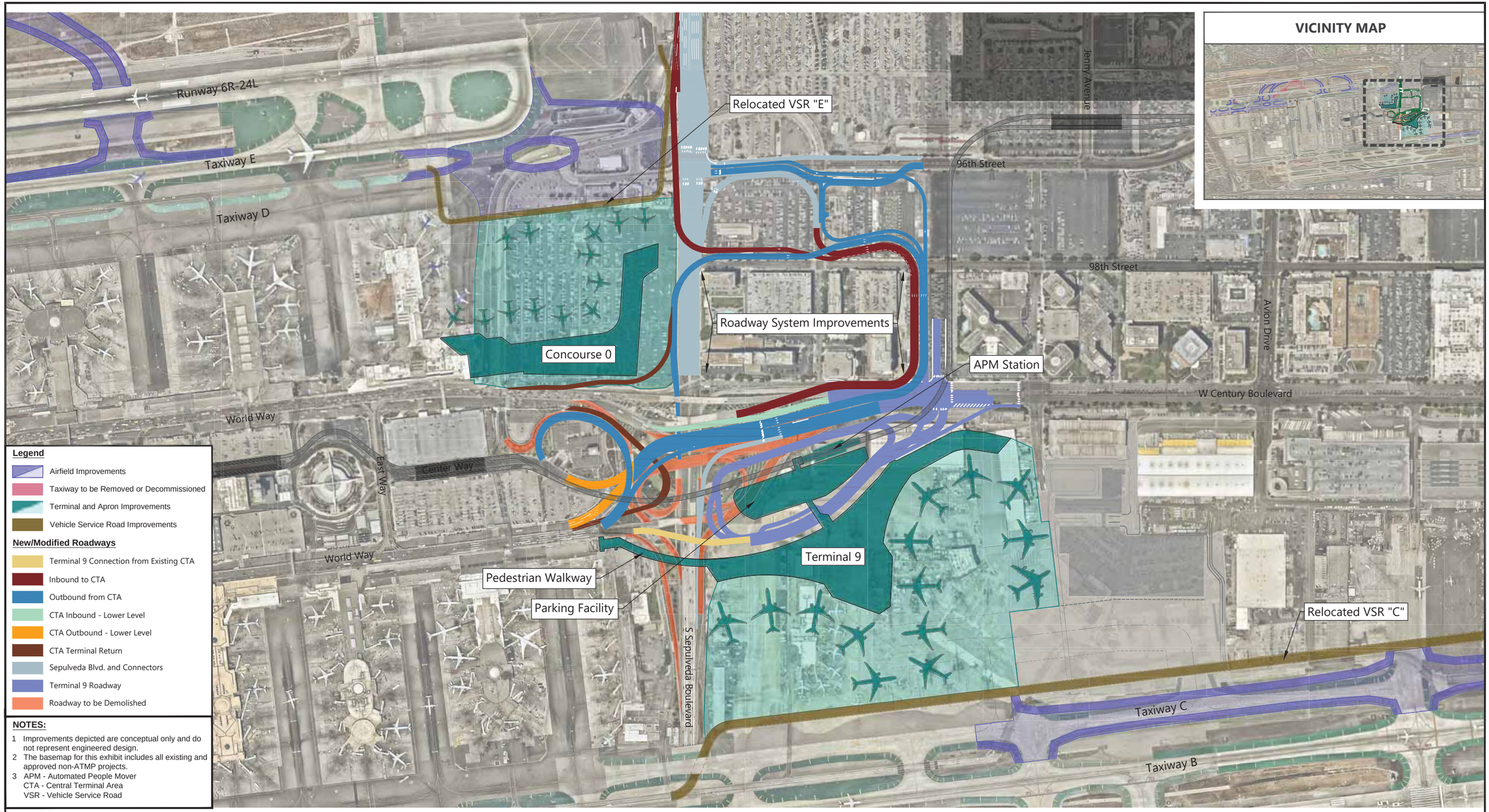
0 600 ft.

Sources: Los Angeles World Airports, *Airport Layout Plan – Existing Layout Plan Sheet*, March 14, 2018 (proposed Airfield and Terminal Modernization Project and Midfield Satellite Concourse Program airfield improvements); Los Angeles World Airports, June 2017 (aerial photography).
Prepared by: Ricondo & Associates, Inc., May 2021

LAX Airfield and Terminal Modernization Project

Runway 6L-24R Exits

Figure **2-6**



Sources: Los Angeles World Airports, *Airport Layout Plan – Existing Layout Plan Sheet Working Draft, June 15, 2017* (Runway 6L-24R exit reconfiguration); Los Angeles International Airport, June 2017 (aerial photography); Ricondo & Associates, Inc., May 2018 (Concourse 0 and Terminal 9); CFWright Consulting, LLC, July 2020 (improved CTA entrance/exit); Los Angeles World Airports, July 2020 (LAX Landside Access Modernization Program).
Prepared by: Ricondo & Associates, Inc., May 2021

LAX Airfield and Terminal Modernization Project

LAX Airfield and Terminal Modernization Project Landside Element Details

Figure **2-7**

10. For reasons described in Item 3 under the heading Chapter 1, Introduction and Executive Summary, above, the fifth sentence of the first paragraph on page 2-38 of the Draft EIR is hereby revised as follows:

    The three remaining West Remote Gates would *remain in operation* ~~be retained to provide operational flexibility, such as for intermittent use if needed during peak surges in activity, if several CTA gates are out of service for maintenance, or for special flights requiring additional security and special logistics (e.g., Air Force One)~~.

11. For reasons set forth in Response to Comment ATMP-PC008-1, Figure 2-22 on page 2-51 of the Draft EIR is hereby revised to depict a traffic signal at Sepulveda Boulevard and 96th Street. Please see the following revised figure.

12. The second and third bullets on page 2-58 of the Draft EIR are hereby revised to correct typographical errors, including missing text, as follows:

    - Contractors shall provide vehicle tracking control*s* at construction staging area access road entrances to reduce entrained dust.
    - Contractors shall be responsible for continuous cleanup of all construction-related dirt on approach routes to the construction site and, when requested by LAWA, contractors shall furnish and operate a self-loading motor sweeper with spray nozzles at *least* once each working day for the purpose of keeping paved areas acceptably clean wherever construction is incomplete.

13. The second bullet on page 2-59 of the Draft EIR is hereby revised. The reason for this change is to provide consistency with LAWA's Design and Construction Handbook. The revision is as follows:

    - Material and debris haul trucks shall be *used that are* constructed, ~~or contents~~ covered, *or loaded* such that the material or debris does not *drop,* sift, blow, leak, spill, or otherwise escape from the vehicle.

14. The fourth bullet on page 2-59 of the Draft EIR is hereby revised. The reason for this change is to provide consistency with LAWA's Design and Construction Handbook. The revision is as follows:

    - Construction staging (including loading/unloading of heavy construction materials and parking of construction vehicles *[including worker vehicles]*) shall be prohibited on streets adjacent to schools, daycare centers, and hospitals.

15. The eighth and ninth bullets on page 2-59 of the Draft EIR are hereby revised. The reason for these changes are to provide consistency with LAWA's Design and Construction Handbook. The revisions are as follows:

    - All new aircraft parking positions shall be installed with ground power and pre-conditioned air, where applicable*, as coordinated and approved by LAWA*.
    - New LAWA or tenant building construction or renovation projects shall meet one of the following:
        - LEED® Silver certification if the project meets the U.S. Green Building Code (USGBC) and LAWA LEED® Eligibility Criteria, unless exempted by LAWA's Sustainability Review Committee,
        - Los Angeles Green Building Code (LAGBC) Tier 1 requirements if not eligible for LEED® certification*, or*
        - LAWA Sustainable Design and Construction requirements if not eligible for LEED® certification and not able to meet LAGBC Tier 1 requirements.

16. The paragraph on page 2-61 of the Draft EIR is hereby revised. The reason for these changes is to reflect that LAWA has not decided on the final relocation site for the subject facility and has identified a fifth potential site. The revisions are as follows:

> Enabling projects refer to existing uses located in or near the proposed improvement sites that would need to be removed and/or relocated to accommodate the proposed improvements. **Table 2-4** provides an overview of the enabling projects associated with the proposed Project, including the name, size, and disposition of each facility. **Figure 2-26a** and **Figure 2-26b** delineate the locations of the affected facilities. In the case of one enabling project, the Southwest Airlines GSE Facility (identified as #7 in Table 2-4 and on Figure 2-26a), the facility would be relocated to a new location at LAX. As described in Table 2-4, several relocation sites are under consideration for the new facility. No decision has been made regarding which ~~of these~~ option~~s~~ would be used to relocate this facility~~; one of the four locations, however, would be used~~. ~~These four~~ *Five* relocation site options are identified in **Figure 2-27**.

17. Table 2-4 on pages 2-63 to 2-67 of the Draft EIR is hereby revised as follows: (1) Map ID #4 is revised to define an acronym. (2) Map ID #7 is revised to identify a fifth potential relocation site for the Southwest Airlines GSE facility. (3) The entry that was originally Map ID #9 through 12 is revised to reflect changes to the navigational aid enabling projects due to the westerly movement of the easternmost runway exit described in Item 1 under the heading Chapter 1, Introduction and Executive Summary, above; all subsequent enabling projects have been renumbered as a result of this revision. (4) Map ID #16 (originally #18) is revised to add the relocation or removal of the "LAX" letterforms as an enabling project. (5) Map ID #22 (originally #25) is revised for reasons set forth in Response to Comment ATMP-AL010-12. These revisions are as follows:

Not to scale

Source: CDM Smith, 2019
Prepared by: CDM Smith, July 2021

Legend

C0 - Concourse 0
T8 - Terminal 8
T9 - Terminal 9

Notes:

1. Improvements depicted are conceptual only and do not represent engineered design or architectural treatments. Related infrastructure (e.g., perimeter fencing, retaining walls) is not shown.
2. APM to be constructed as part of the LAX Landside Access Modernization Program.

LAX Airfield and Terminal Modernization Project

View Looking South along Sepulveda Boulevard

Figure **2-22**

Table 2-4
Description of Enabling Projects, Facilities, and/or Activities

Map ID #	Affected Facility	Facility Description	Approximate Building Size/Footprint Area of Affected Facility	Current Use	Disposition of Facility/Use	Project Component
1	Vehicle Service Road E (between Taxiway E17 and Taxiway R)	This portion of Vehicle Service Road E provides a route for airport vehicles to access the western portion of the north airfield.	386,000 square feet	Airfield road used by service vehicles	The westerly portion of the existing vehicle service road would be removed and would be replaced by a new vehicle service road located south of the Taxiway D extension.	Taxiway D Extension West
2	West remote passenger gates	The area situated south of Runway 6R-24L, north of World Way West, west of Taxiway AA, and east of Pershing Drive contains remote passenger gates. The West Remote Gates accommodate flights that cannot be handled in the CTA. Passengers are transported to and from the gates on buses from the CTA.	700,000 square feet	Aircraft passenger gates	Nine existing West Remote Gates would be required to be removed in order to accommodate the westerly extension of Taxiway D. In addition, an additional six West Remote Gates would be decommissioned (i.e., would no longer be used for regularly-scheduled commercial flights) as part of the proposed Project, even though those six gates are not within the area required for the extension of Taxiway D. The affected remote gates would be replaced by new passenger gates at Concourse 0 and Terminal 9.	Taxiway D Extension West
3	GSE staging areas	Several GSE staging areas are located within the western portion of LAX, including west of Taxiway AA between aircraft parking positions and West Remote Gates, and in two areas immediately south of Vehicle Service Road E, one located north of the FedEx maintenance facility and the other located west of the airfield busing facility. These outdoor areas are used by various airlines and aviation services companies to store GSE and related equipment when not in use.	Total area for the three GSE staging areas is approximately 56,000 square feet	GSE staging areas	Existing uses would be accommodated on nearby available on-airport property.	Taxiway D Extension West
4	LAWA maintenance facilities 7407 World Way West	LAWA's maintenance yard is located within the western portion of LAX north of World Way West. The overall facility occupies approximately 965,0000 square feet and includes over 20 buildings, sheds, and storage areas that include Fleet Maintenance; Paint Shop, Carpentry and Plumbing; Electrical, Mechanical, Upholstery, A*ir C*<u>*onditioning*</u>, and other trades; Welding; Spray Booth; and various storage buildings and offices. Employee parking is located in a parking lot on the east side of the facility.	187,000 square feet	Maintenance facilities	Maintenance facilities in the northern portion of the LAWA maintenance yard would be affected by the westerly extension of Taxiway D, including two buildings, maintenance service areas, maintenance storage areas, and a portion of the vehicle parking area. The displaced facilities would be moved south of World Way West, occupying the parking lot in and around a liquefied natural gas (LNG)/compressed natural gas (CNG) facility whose use is planned to be discontinued. No buildings would be required to be constructed to accommodate the relocation.	Taxiway D Extension West
5	FedEx maintenance facilities 7401 World Way West	FedEx operates a 950,000-square-foot (22.5-acre) maintenance facility on the western side of LAX that performs routine maintenance, safety checks, and major and minor unscheduled repairs. The facility includes a maintenance hangar, workshops, storage buildings, apron area and aircraft parking positions, and a blast fence. The total building area on the leasehold is approximately 423,000 square feet.	The area directly affected by the proposed Project is approximately 297,500 square feet. However, the proposed Project would require removal of the entire 8,750-square-foot component repair building, only a portion of which lies in the footprint. The total area affected is approximately 308,000 square feet.	Aircraft maintenance facilities	The westerly extension of Taxiway D would require the removal of some of FedEx's facilities in the northern portion of the site, including an aircraft parking position, aircraft apron area, component repair building, and hazardous materials storage shed. The affected uses would be consolidated within the remaining FedEx maintenance area. The blast fence on the eastern edge of the leasehold would be modified/ shortened by approximately 10 feet.	Taxiway D Extension West
6	Aircraft fueling system infrastructure	LAXFUEL Corporation operates an on-airport Jet A fuel storage facility (fuel farm) located north of World Way West and south of the north airfield. The fuel farm is an above-ground fuel storage facility that is integrated with fuel hydrant systems that deliver fuel to aircraft gates. The facility houses 19 large storage tanks, a state-of-the-art filtration system, a pumping system, an electronic monitoring system, and related facilities.	Approximately 40,000 square feet	Aircraft fueling facility truck loading rack	A truck loading rack at the LAXFUEL facility would be removed and relocated nearby.	Taxiway D Extension West

Table 2-4
Description of Enabling Projects, Facilities, and/or Activities

Map ID #	Affected Facility	Facility Description	Approximate Building Size/Footprint Area of Affected Facility	Current Use	Disposition of Facility/Use	Project Component
7	Southwest Airlines' GSE/vehicle maintenance facility and garage 9601 Coast Guard Road	A Southwest Airlines GSE/vehicle maintenance facility is located on the west side of the airport. The leasehold is 26,252 square feet, and includes a 7,972-square-foot building.	26,252 square feet	GSE/vehicle maintenance facility and garage	The existing maintenance facility and garage would be removed and relocated. *Five* ~~Four~~ sites are currently under consideration: (1) A 124,940-square-foot undeveloped parcel adjacent to the Police Firing Range, at 7117 W. Imperial Highway. (2) A 124,234-square-foot site housing the current Flying Food operation, which is located in a 32,090-square-foot building on California Street, at 6751 W. Imperial Highway. The Flying Food lease will expire in 2021. Flying Food is currently constructing an off-airport facility. (3) A 23,131-square-foot portion of the future Concourse 0. (4) A new building on a 28,907-square-foot site located west of the future LAX ITF West. *(5) An approximately 35,000-square-foot site that contains an approximately 25,000-square-foot building located near the northern portion of the LAX Fuel Farm*. See Figure 2-27 for relocation site options.	Taxiway D Extension West
8	Airfield Bus Yard Facility 7285 World Way West	The existing Bus Yard Facility is located northeast of the LAX fuel farm at 7285 World Way West. It has the capacity for 35 airfield buses and support vehicles to transport passengers between airside access points and the CTA and the West Remote Gates, and between airside terminal facilities and US Customs and Border Protection processing areas. The facility is not sufficient to accommodate LAWA's transition to an electric bus fleet. Development of a new Bus Yard is currently in progress. The new facility is independent from the proposed Project (see Table 3-1).	126,000 square feet	Facilities for airfield busing and parking	Construction of a new Bus Yard Facility at a different site has been approved and is occurring independently from the proposed Project (see Table 3-1). As part of the proposed Project, the existing airfield Bus Yard Facility and related infrastructure would be removed.	Taxiway D Extension West
9 *and 10* ~~thru 12~~	Navigation aids within the North Airfield	Existing navigational aids to be relocated include: the Automated Surface Observing System (i.e., weather station) and *Low Level Windshear Alert System* - Map ID #9; ~~Runway 24R Precision Approach Path Indicator for Runway 24R - Map ID #10; Runway 24L Precision Approach Path Indicator for Runway 24R - Map ID #11;~~ and wind sock - Map ID #*10*~~12~~.	NA	Navigational aid	These existing navigational aids would each be relocated to a suitable location in the north airfield.	Runway 6L-24R Exits
11~~13~~	"LAX-it" passenger pickup lot 6351 W. Century Boulevard	The "LAX-it" pickup lot is located on a 20-acre site formerly occupied by the Park One privately-operated surface parking lot. LAX-it is a centralized area for airport passengers and guests to pick up a taxi and ride app service. The pickup lot will remain in service until the APM opens in 2023. Decommissioning of the pickup lot will occur independently from the proposed Project.	40 acres	LAX taxi/ride share pickup facility	The taxi/ride share pickup lot will be decommissioned independently from the proposed Project. The remaining infrastructure on the site would be demolished as part of the proposed Project.	Concourse 0
12~~14~~	Allied Signal/Honeywell monitoring wells and remediation equipment	The LAX-it pickup lot/former Park One parking facility was previously occupied by an Allied Signal facility whose operation resulted in contamination of soil and groundwater beneath the site. Monitoring wells and remediation equipment is currently located on the site.	NA	Soil/groundwater remediation	Construction of Concourse 0 could result in the decommissioning and/or relocation of monitoring wells and remediation equipment located on the Project site. (See Section 4.5, *Hazardous Materials*, for additional discussion.)	Concourse 0
13~~15~~	LAWA Airport Police Division Headquarters and vehicle parking 6320 W. 96th Street	The LAWA Airport Police Division (APD) has a 47,840-square-foot facility located at 6320 W. 96th Street, as well as nearby parking and ancillary facilities. The main facility is located east of Sepulveda Boulevard between Park One and the 96th Street Bridge. An ancillary APD building and parking area are located on a 1.17-acre parcel located on the west side of Alverstone Avenue between W. 96th Street and an unnamed road that lies to the south of the airfield perimeter fence. Additional APD parking is located on the northeast corner of W. 96th Street and Alverstone Avenue on a 1.65-acre parcel. LAWA is currently constructing a new Airport Police Facility that will co-locate many of APD's functions onto one site, including the facility on W. 96th Street. The new Airport Police Facility is independent from the proposed Project (see Table 3-1).	240,000 square feet	Police headquarters and vehicle parking area	Construction of a new LAWA APD Facility at a different site has been approved and is occurring independently from the proposed Project (see Table 3-1). As part of the proposed Project, the existing LAWA APD facility and related surface parking would be removed.	Concourse 0
14~~16~~	Security Post 3 and Vehicle Service Road E (between Taxiway E7 and Security Post 3)	Security Post 3 provides an access point to the eastern portion of the north airfield for authorized vehicles. The affected portion of the vehicle service road provides a route for airport vehicles to access the easternmost portion of the north airfield.	42,000 square feet	Security post and airfield road used by service vehicles	The easternmost portion of the existing airside vehicle service road would be removed and relocated to the south of the proposed Taxiway D extension. Security Post 3 would be removed.	Concourse 0

Table 2-4
Description of Enabling Projects, Facilities, and/or Activities

Map ID #	Affected Facility	Facility Description	Approximate Building Size/Footprint Area of Affected Facility	Current Use	Disposition of Facility/Use	Project Component
15~~17~~	96th Street, Alverstone Avenue, and unnamed street	Surface streets located west of Sepulveda Boulevard and north of the Airport Police Facility provide access to/from Sky Way/96th Street Bridge, the existing Airport Police Facility, and Security Post 3.	96th Street – approximately 665 feet; Alverstone Ave – approximately 300 feet Unnamed Street – approximately 420 feet	Roadways providing access to Sky Way/96th Street Bridge, Airport Police Facility, Security Post 3, and Sepulveda Boulevard	Portions of W. 96th Street, Alverstone Avenue, and an adjacent, unnamed access road would be closed and removed.	Concourse 0
16~~18~~	*LAX Letterforms and* LAX Gateway Pylons	Eleven Gateway pylons line 1.5 miles of Century Boulevard, growing in height from 25 feet to 60 feet before culminating in *"LAX" letterforms followed by* a ring of 15, 100-foot columns at the entrance to LAX.	NA	Aesthetic enhancement	Construction of the roadway improvements would require the relocation, reconfiguration~~,~~ and*/or* removal of *the "LAX" letterforms and* some of the pylons.	Landside improvements
17~~19~~	Delta Air Lines GSE building	This facility houses Delta Air Lines' GSE storage and maintenance facility.	18,583 square feet	GSE maintenance	GSE maintenance activities have been relocated to the new Delta Air Lines Maintenance facility recently constructed within the West Aircraft Maintenance Area. The remaining infrastructure on the site would be demolished as part of the proposed Project.	Terminal 9
18~~20~~	Aircraft parking areas	Aircraft parking areas associated with the American and United Airlines' leaseholds are located within the central and western portions of the Terminal 9 site, east of Sepulveda Boulevard. Three small aircraft maintenance support buildings (ranging from 180 to 275 square feet in size) are located within the westernmost aircraft parking area along the western edge of the Terminal 9 site.	272,000 square feet	Aircraft parking areas/storage	The existing aircraft parking areas and nearby buildings would be removed.	Terminal 9
19~~21~~	American Eagle Commuter Terminal 6002 Avion Drive	The American Eagle Commuter Terminal services American Airlines' regional aircraft (i.e., commuter) operations. The facility includes a 33,165-square-foot passenger terminal with administrative support space; a 9,963-square-foot building used for baggage handling, office space, and storage for cabin services and light aircraft maintenance activities; and 10 aircraft gates.	43,128 square feet	Commuter Terminal	Commuter operations at this facility will be relocated to the Midfield Satellite Concourse as part of a separate, previously-approved, independent project. Demolition of the vacated facility would be required as an enabling project.	Terminal 9
20~~22~~	Ground equipment maintenance/storage area	The central portion of the Terminal 9 site is used by United Airlines, Delta Air Lines, and American Eagle for ground equipment storage and maintenance.	135,000 square feet	GSE/equipment storage	The existing equipment maintenance/storage areas would be removed and the storage/ maintenance activities would be consolidated within existing facilities.	Terminal 9
21~~23~~	LAWA Records Retention Building	The six-story LAWA Records Retention Building houses LAWA records and IT equipment. One floor of the building is leased by Delta Air Lines.	100,053 square feet	Records retention, IT operations, airline support operations	The existing building would be removed. LAWA records would be consolidated and relocated to existing LAWA office space or to an off-site storage facility. The LAWA IT equipment would be relocated to an existing LAWA office space (such as the administration building on World Way West or LAWA's Skyview office buildings). The Delta Air Lines use would be consolidated into existing airline facilities or relocated off of the airport.	Terminal 9
22~~24~~	Mercury Air Cargo facility 6040 Avion Drive	A Mercury Air Cargo facility is located on the eastern end of the Terminal 9 site, at 6040 Avion Drive on a 235,826-acre site. The facility handles international and domestic airline cargo. Mercury Air Cargo's lease at this location will expire in *2023, with two one-year extension options at LAWA's discretion* ~~2021; a lease extension is currently underway~~. Relocation of the Mercury operation following expiration of the lease will occur independently from the proposed Project.	171,787 square feet	Cargo handling	Relocation of the cargo operation will occur independently from the proposed Project upon expiration of Mercury's lease. As part of the proposed Project, the existing facility and related infrastructure would be removed.	Terminal 9
23~~25~~	American Airlines cargo staging area 5950/5970 Avion Drive	The 98,036-square-foot American Airlines Cargo and GSE Facility is located within the southern portion of the Century Cargo Complex.	40,000 square feet	Cargo handling/storage	A portion of the cargo staging area within the southeast corner of the parcel would be removed. Existing cargo handling/ storage would be consolidated within the leasehold.	Terminal 9

Table 2-4
Description of Enabling Projects, Facilities, and/or Activities

Map ID #	Affected Facility	Facility Description	Approximate Building Size/Footprint Area of Affected Facility	Current Use	Disposition of Facility/Use	Project Component
24~~26~~	Air Freight Building #10 5908 Avion Drive	The 57,377-square-foot building and adjacent area is used for cargo operations.	The area directly affected by the proposed Project is approximately 55,000 square feet, of which approximately 10,000 square feet is the southernmost portion of the building. A slightly greater portion of the building may be required to be demolished to preserve the building's integrity (i.e., preserve load-bearing walls/components of the building); however, it is anticipated that the majority of the building would remain.	Cargo handling	A portion of the Air Freight #10 building and the adjacent ramp and vehicle access areas would be removed. Existing cargo handling would be consolidated within the remaining portion of the building.	Terminal 9
25~~27~~	LAWA Operations aircraft parking areas	Aircraft parking areas are located between Air Freight Building #10 and Air Freight Building #8, and to the east of Air Freight Building #8.	250,000 square feet	Aircraft parking areas	The southerly portion of the aircraft parking areas would be removed.	Terminal 9
26~~28~~	Air Freight Building #8 5720 Avion Drive	The 70,891-square-foot building and adjacent area is used by various tenants for cargo operations, GSE support, hazardous materials storage, and aircraft/maintenance/overhaul (MRO) support.	The area directly affected by the proposed Project is approximately 85,000 square feet, of which approximately 15,000 square feet is the southern portion of the building. A slightly greater portion of the building may be required to be demolished to preserve the building's integrity (i.e., preserve load-bearing walls/components of the building); however, it is anticipated that the majority of the building would remain.	Cargo handling, GSE, hazardous materials storage, and aircraft MRO support	A portion of the Air Freight #8 building, including the vehicle parking area to the west of the building and the equipment storage area to the east of the building, would be removed. Existing uses would be consolidated within the remaining portion of the building or relocated to other facilities at LAX.	Terminal 9
27~~29~~	Vehicle Service Road C (between Taxiway C5 and east of Taxiway B1)	This portion of Vehicle Service Road C provides a route for airport vehicles to access the eastern portion of the south airfield.	280,000 square feet	Airfield road used by service vehicles	The easterly portion of the existing vehicle service road would be removed and would be replaced by a new vehicle service road located north of the proposed Taxiway C extension.	Terminal 9
28~~30~~	Los Angeles Community College District property 9700 S. Sepulveda Boulevard	A Los Angeles Community College District property is located east of Sepulveda Boulevard between W. 96th Street and W. 98th Street. The property is improved with two airplane hangars that West Los Angeles College currently uses for the warehousing of movie set props and for instruction to support its Film/Television Production Crafts program. One course per quarter currently takes place at this facility. The majority of the site is leased to a private parking operator, which is operated in conjunction with the property located at 9600 S. Sepulveda Boulevard (see below).	2.06 acres	Community College, privately-operated public parking lot	The edges of the Los Angeles Community College District property would be acquired outright or through permanent or temporary construction easements. The existing structures along the southern edge of the property would be removed for the proposed roadway improvements. The main warehouse facility in the middle of the site would not be acquired and access to 96th Street would be maintained, allowing the facility to continue to be used for its current purposes.	Landside
29~~31~~	Commercial parking lot 9600 S. Sepulveda Boulevard	WallyPark Express operates a commercial parking lot located north of Los Angeles Community College District property and south of 96th Street.	1.47 acres	Privately-operated public parking lot	The existing parking lot would be acquired and the structure at the northwest corner of the property would be removed.	Landside
30~~32~~	LADWP parcel 9750 S. Vicksburg Avenue	The property located on the east side of Vicksburg Avenue north of W. 96th Street is owned by LADWP. The southern portion of the property is leased for private parking.	0.62 acres	Parking	The southern two-thirds (approximately) of the parcel, located north of 96th Street and south of the electrical substation, would be acquired and the parking lot would be removed.	Landside

Table 2-4
Description of Enabling Projects, Facilities, and/or Activities

Map ID #	Affected Facility	Facility Description	Approximate Building Size/Footprint Area of Affected Facility	Current Use	Disposition of Facility/Use	Project Component
31~~33~~	Commercial parking lot 6155 W. 98th Street	Sunrise LAX Airport Parking operates a parking lot and shuttle operation located between W. 96th Street and W. 98th Street, east of the LADWP parcel.	1.26 acres	Privately-operated public parking lot	The existing property would be acquired and the small structure on the southern edge of the site would be removed.	Landside
32~~34~~	LAX Taxi Staging Lot	A taxi staging lot is located east of the Sunrise parking lot, between the W. 96th Street and W. 98th Street. The taxi staging lot is located on LAWA-owned property. The facility operates under a lease that will expire in 2021.	Approximately 1.3 acres	Taxi staging	The existing staging lot would be relocated or reconfigured. Relocation, if required, would occur on a nearby parcel, which could be on a LAWA-owned site or other location in the area.	Landside

Source: LAWA, CDM Smith, ~~2020~~ *2021*.

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18. For reasons described in Item 1 under the heading Chapter 1, Introduction and Executive Summary, above, Figure 2-26a on page 2-69 of the Draft EIR is hereby revised to remove the Runway 24R and Runway 24L PAPIs as enabling projects for the airfield improvements. In addition to this revision, Figure 2-26a is hereby revised to add a Low Level Windshear Alert System (LLWAS) as an enabling project for the airfield improvements (see revisions to Table 2-4 above). Please see the following revised figure.

19. Figure 2-26b on page 2-71 of the Draft EIR is hereby revised to add the relocation and/or removal of the "LAX" Letterforms as a component of an enabling project for the landside improvements, for reasons described in Item 17 above; show the locations of billboards that are currently existing within the Project footprint but that would be acquired and/or displaced as part of the LAX Landside Access Modernization Program, for reasons set forth in Response to Comment ATMP-PC001-2; and reflect the renumbering of enabling projects due to the removal of the two PAPI relocations as enabling projects (see revisions to Table 2-4 above). Please see the following revised figure.

20. Figure 2-27 on page 2-73 of the Draft EIR is hereby revised to show the location of a fifth option for relocation of the Southwest Airlines GSE Facility. The reason for this change is because LAWA has identified a fifth potential site for relocation of the subject facility. Please see the following revised figure.

21. The first paragraph on page 2-75 of the Draft EIR is hereby revised. The reason for the changes is to correct a typographical error and to reflect a change to Figure 2-26b with respect to billboards, for reasons described in Item 19 above. The revisions are as follows:

> In some cases, the removal or relocation of uses that currently exist within the Project footprint is already planned and/or approved to occur independently from the proposed Project; these removals and relocations would occur prior to and/or separately from the proposed Project. The projects that have independent utility from the proposed Project include the following and are identified on Figures 2-26a and 2-26b with a*n alpha* ~~numeric~~, rather than *numeric* ~~alpha~~, designation *(billboards are designated on Figure 2-26b by a blue dot)*:

22. As set forth below, where the Draft EIR formerly referred to a construction start date of 'late 2021,' the text is being revised to refer to a start date of 'early 2022.' These changes are all made because LAWA reevaluated the construction start date for the proposed Project in light of the status of the CEQA and the NEPA environmental reviews of the proposed Project, including extensions of the public comment periods, and determined that a January 2022 start date was more reasonable than an April 2021 construction start date. As a result of this change, the phasing analysis was updated, resulting in changes to the start and completion dates of various project elements. Construction would still be completed in 2028. Conforming changes are also made to other references in the Draft EIR to the schedule for construction, as set forth below. The change in the date construction is expected to commence, and the related revisions to the phasing of the various Project-related elements, does not alter the conclusions in the Draft EIR. In this instance, Section 2.6.1 on pages 2-77 and 2-78 of the Draft EIR is hereby revised as follows:

2.6.1 Phasing

Figure 2-28 shows the development phasing for the proposed Project, broken down into the four major elements: North Airfield Improvements, Concourse 0, Terminal 9, and Roadways System (Landside) Improvements.

As shown in Figure 2-28, development of the North Airfield improvements would begin *in early-2022* ~~around late 2021~~ with initiation of the enabling projects for the Taxiway D westerly extension. As each enabling project is completed, construction of the taxiway improvements would occur along those segments and would generally continue in that manner through completion in mid- *to late-*2026.

Development of Concourse 0 would begin around *early-2022* ~~late 2022~~ with initiation of enabling projects and construction activities for the eastern portion of the concourse and apron, followed by completion of enabling projects in ~~late~~ *early*-2024, and completion of Concourse 0 construction around ~~late 2026~~ *mid-2027*.

Terminal 9 development activities would begin *mid-2022* ~~around late 2021 or early 2022~~ with*in* initiation of the enabling projects that would continue through approximately *early-2025* ~~mid-2024~~. Construction of Terminal 9 and the associated apron would begin approximately *mid-2023* ~~late 2023~~ and is anticipated to be completed around ~~late 2027~~ *mid-2028 prior to the 2028 Olympic and Paralympic Games*. Construction of the Taxiway C extension and relocation of the vehicle service road would begin in approximately *early-2026*~~late 2024~~ and be completed around *early-2028*~~late 2026~~.

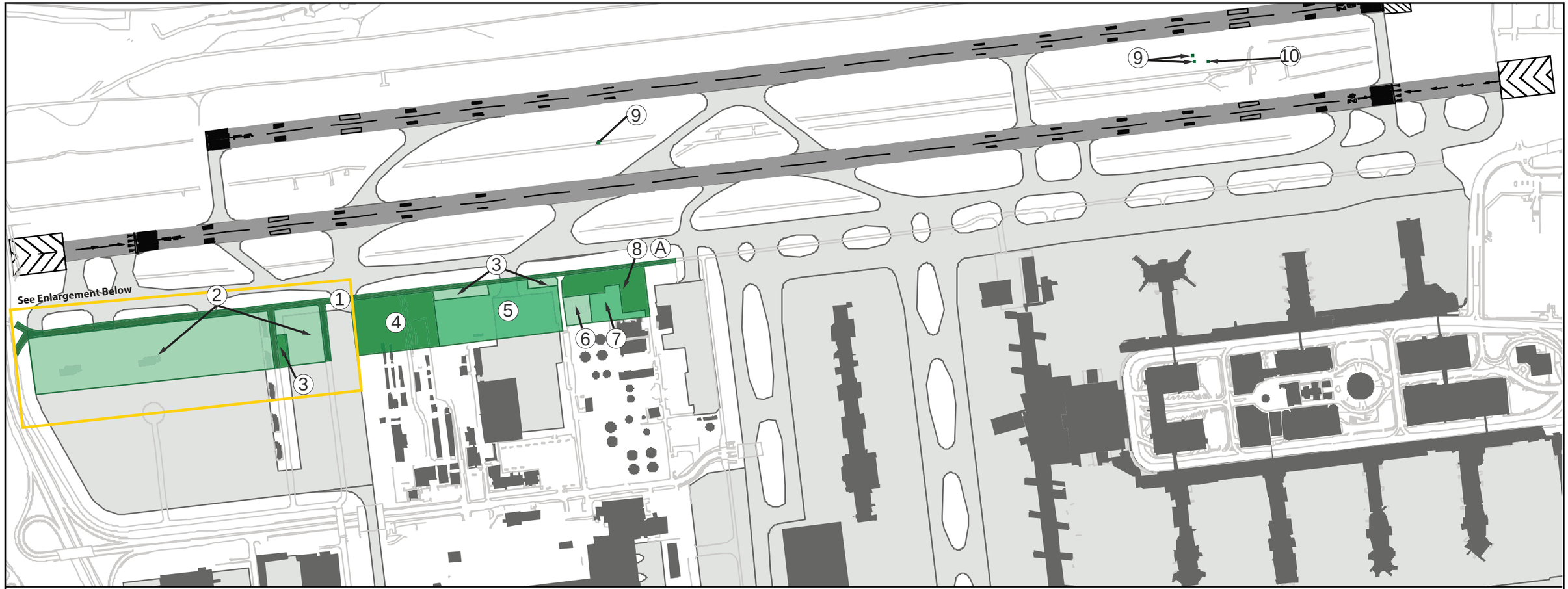
Construction of the roadway system improvements would begin around early-2022 with initiation of improvements to/along Sepulveda Boulevard and continue on an on-going basis through the different areas of the roadway system to completion in ~~early~~ *mid-*2028 *prior to the 2028 Olympic and Paralympic Games*. In conjunction with construction of the proposed roadway system improvements, there would be some temporary detours and rerouting of traffic onto other existing streets nearby or onto newly construction temporary access roads. The details of such temporary rerouting of traffic would be determined in conjunction with development of Maintenance of Traffic (MOT) plans as part of construction plans for the individual roadway segments.

It is anticipated that the majority of construction activities within each phase of development would occur during daytime hours (i.e., typically between 7:00 a.m. and 3:30 p.m.). It is likely that there could be some limited periods when construction activities are scheduled to occur both during the daytime and nighttime hours, as second and third shifts, in order to conduct work activities that cannot normally be accomplished during the daytime shift (e.g., during large-scale pours of concrete when it would be necessary to maintain a continuous stream of concrete deliveries through multiple shifts, or when it is safer and more efficient to complete airfield improvement work late at night when aircraft activity levels are very low)*, or as otherwise needed to complete specific activities within an overall schedule for a proposed Project component*.

23. For reasons described in Item 22 above, Figure 2-28 on page 2-79 of the Draft EIR is hereby revised to reflect a refinement of the construction schedule from a start date of April 2021 to January 2022 and related schedule modifications. Please see the following revised figure.

24. For reasons set forth in Response to Comment ATMP-AL006-16, the paragraph under Section 2.6.5.2 on page 2-83 of the Draft EIR is hereby revised as follows:

Landside access proposed for Terminal 9 includes various ramps and roadway segments that integrate into the overall proposed LAX Airfield and Terminal Modernization Program ~~Phase 1~~ roadway system. Construction of certain of those ramps and segments is anticipated to occur in the latter phases of developing the overall LAX Airfield and Terminal Modernization Program roadway system, which would be subsequent to the anticipated completion of Terminal 9. As *a construction implementation option* ~~such~~, temporary roadway improvements *may be developed if needed* ~~are proposed~~ to provide interim access to Terminal 9. *Under this option* ~~Specifically~~, two ramps *would* ~~are proposed to~~ be developed from northbound Sepulveda Boulevard, just north of the Sepulveda Tunnel, with one ramp going to the departures level curb outside Terminal 9 and the other ramp going to the arrivals level curb outside Terminal 9. **Figure 2-30** depicts the location of the subject ramps.



Enabling Projects

1. Vehicle Service Road "E"
2. West Remote Passenger Gates
3. GSE Staging Areas
4. LAWA Maintenance Facilties
5. FedEx Maintenance Facilites
6. Aircraft Fueling System Infrastructure
7. Southwest Airlines GSE Facility
8. Airfield Bus Yard Facility Demolition
9. ASOS and LLWAS
10. Wind Sock

Facilities to be Relocated Independently

A. Airfield Bus Yard Facility Relocation

Legend

- LAX Property Boundary
- Enabling Projects[1]

ASOS - Automated Surface Observing System
GSE - Ground Support Equipment
LAWA - Los Angeles World Airports
LLWAS - Low Level Windshear Alert System

Note:
1. Various colors used only to differentiate between enabling project sites.

N

0 885 Feet
Scale

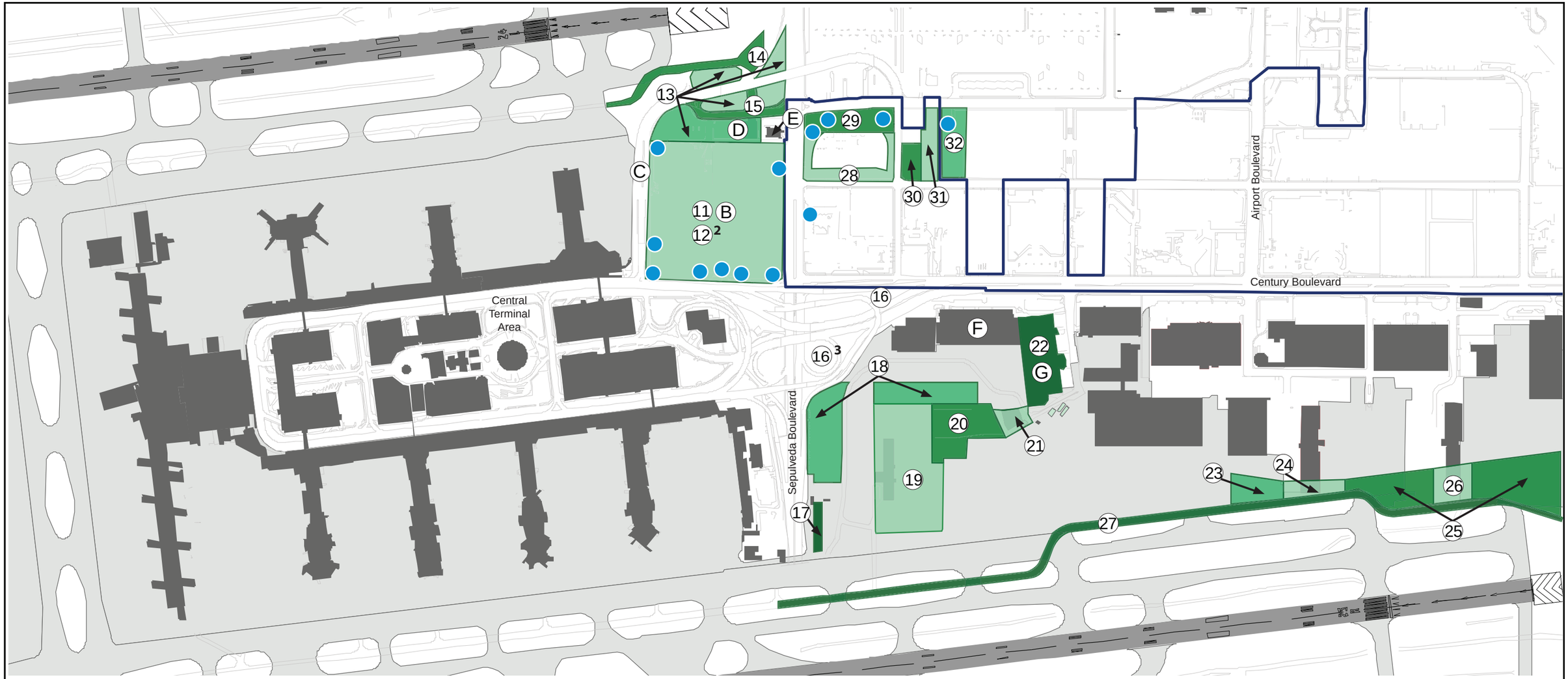
Sources: Ricondo & Associates, Inc., April 2020 (basemap); Los Angeles World Airports, January 2020 (Airport Layout Plan); CDM Smith, April 2020 (Airport Property Line and enabling projects)

Prepared by: CDM Smith, May 2021

LAX Airfield and Terminal Modernization Project

Enabling Projects for Airfield Improvements

Figure **2-26a**



0 885 Feet

Scale

Sources: Ricondo & Associates, Inc., April 2020 (basemap); Los Angeles World Airports, January 2020 (Airport Layout Plan); CDM Smith, April 2020 (Airport Property Line and enabling projects)

Prepared by: CDM Smith, July 2021

Enabling Projects

11. "LAX-it" Passenger Pickup Lot Site Demolition
12. Allied Signal/Honeywell Monitoring Wells/ Remediation Equipment
13. LAWA Airport Police Headquarters Demolition
14. Vehicle Service Road "E" & Security Post 3
15. 96th Street & Alverstone Avenue
16. LAX Letterforms and LAX Gateway Pylons
17. Delta Air Lines GSE Building
18. Aircraft Parking Areas
19. American Eagle Commuter Terminal
20. Equipment Maintenance & Storage
21. LAWA Records Retention Building
22. Mercury Air Cargo Facility Demolition
23. American Airlines Cargo Staging Area
24. Air Freight Building #10
25. LAWA Operations Aircraft Parking Areas
26. Air Freight Building #8
27. Vehicle Service Road "C"
28. Los Angeles Community College District Property
29. Commercial Parking Lot
30. LADWP Parcel/Parking Lot
31. Commercial Parking Lot
32. LAX Taxi Staging Area

Facilities to be Removed or Relocated Independently

- B "LAX-it" Passenger Pickup Lot Relocation
- C Sky Way/96th Street Bridge Demolition
- D LAWA Airport Police Headquarters Relocation
- E Reliant Medical Facility Demolition
- F Delta Air Lines Hangar Complex Relocation/Demolition
- G Mercury Air Cargo Relocation
- Billboards to be Acquired and/or Displaced

Legend

- LAX Property Boundary
- Enabling Projects[1]

GSE - Ground Support Equipment
LAWA - Los Angeles World Airports

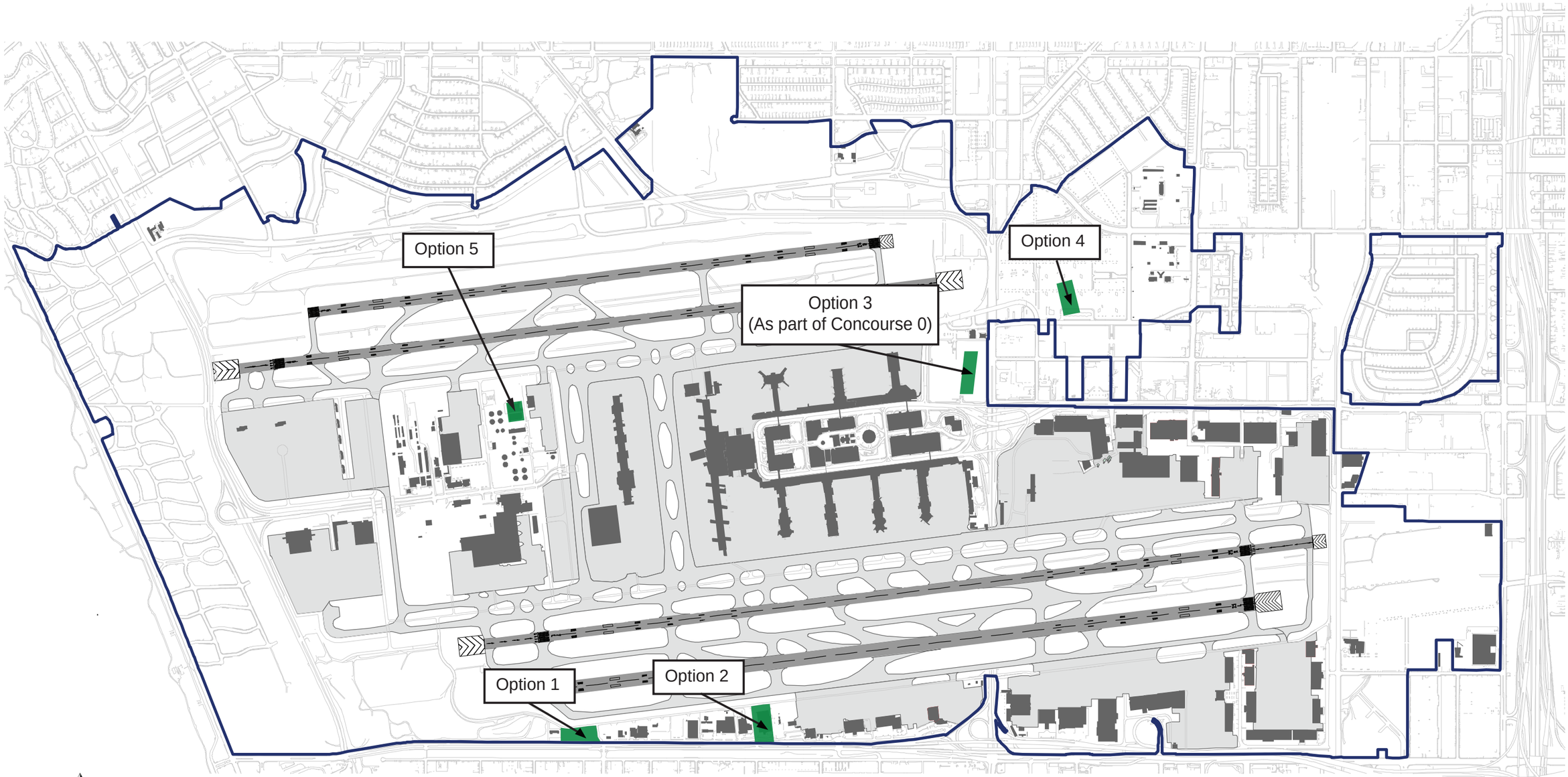
Notes:

1. Various colors used only to differentiate between enabling project sites.
2. Monitoring wells and/or remediation equipment are located throughout the site.
3. Only a portion of the entryway pylons would be relocated. Individual pylons are not identified on the figure.

LAX Airfield and Terminal Modernization Project

Enabling Projects for Concourse 0, Terminal 9, and Landside Improvements

Figure **2-26b**



0 990 1980 Feet
Scale

Sources: Ricondo & Associates, Inc., April 2020 (basemap); Los Angeles World Airports, January 2020 (Airport Layout Plan); CDM Smith, April 2020 (Airport Property Line); Ricondo & Associates, Inc., October 2018 (Project Elements); CF Wright Consulting, July 2020 (Roadway Elements)

Prepared by: CDM Smith, July 2021

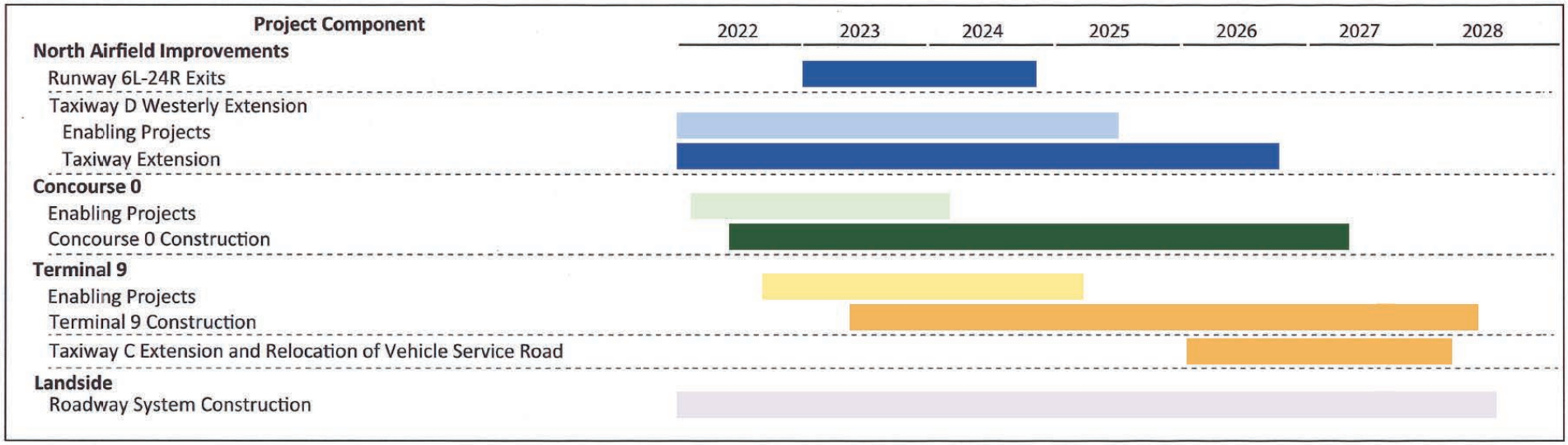
Legend

- LAX Property Boundary
- Relocation Site Options

LAX Airfield and Terminal Modernization Project

Enabling Project Relocation - Southwest Airlines GSE Facility Potential Relocation

Figure
2-27



Sources: CDM Smith

Prepared by: CDM Smith, July 2021

LAX Airfield and Terminal Modernization Project	Construction Phasing	Figure **2-28**

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Chapter 3, Overview of Project Setting

1. For reasons set forth in Response to Comment ATMP-PC038-3, Table 3-1 on pages 3-6 to 3-8 of the Draft EIR is hereby revised as follows:

Table 3-1
Projects At/Adjacent to LAX

	Project	Expected Dates	Description
1	LAX Northside Development	2016 – 2025	Under the approved LAX Northside Project, development of approximately 340 acres of land on the north side of the airport with up to 2,320,000 square feet of development to include recreation and open space; office, research, and development; community and civic; commercial; airport support; and landscape buffer. Near-term projects within LAX Northside include: ▪ Airport Police Facility (May 2019 – June 2021), which will relocate and consolidate LAWA Police *Division* ~~Department~~ facilities, including the police headquarters, shooting range, and canine facility ▪ Receiving Station X (Oct 2019 – May 2023), a new receiving station and installation of feeders to address power reliability issues, provide redundancy in the case of power outages, and accommodate the electrical demand of future infrastructure projects at LAX Area 2 and portions of Area 1, which are located north of Westchester Parkway between Pershing Drive and Loyola Boulevard, are expected to be developed between 2022 and 2025 with up to 901,500 net square feet of a variety of uses in accordance with applicable zoning and design guidelines. The timing for development of the remainder of the LAX Northside area has not been determined.
2	Terminals 2 and 3 Modernization Project	2017 – 2024	Approved improvements to Terminals 2 and 3, consisting of Terminal 2 concourse upgrades and additional floor area; Terminal 3 concourse demolition and reconstruction to provide additional concourse area and a new operation control center; demolition of the Terminal 3 satellite southern appendages; demolition and reconstruction of the passenger and baggage processing facilities (ticketing buildings) at Terminals 2 and 3, including new facilities for passenger and baggage screening, ticketing, and baggage claim; and a secure connector between Terminals 2 and 3.
3	LAX Landside Access Modernization Program[1]	2017 – 2035	Approved improvements within and east of the CTA, including an APM system, ITFs, CONRAC, and roadway improvements. Additionally, certain parcels in the local area would become available for redevelopment with new uses as a result of the LAX Landside Access Modernization Program.[1]
4	Terminal 4 Modernization Project	2021 – 2026	Proposed renovation and/or replacement of portions of the existing concourse and ticketing building, realignment of Taxilane C9, and reconstruction of the apron in order to improve passenger level of service, accommodate modern aircraft fleets and operational support equipment, and provide seismic resiliency and structural safety.

Table 3-1
Projects At/Adjacent to LAX

	Project	Expected Dates	Description
5	LAX Airfield Bus Yard Facility	2020 – 2021	A new 15.9-acre bus yard to accommodate LAWA's transition to electric airfield buses, including an airfield bus parking lot, industrial station and underground utilities duct bank, electrical infrastructure and chargers for electric buses and airfield pool vehicles, office building, and employee parking lot.
6	Runway 7R-25L Rehabilitation	2020 – 2021	Planned reconstruction of runway pavement.
7	Midfield Satellite Concourse (MSC) South Project	2021 – 2024	A new 95,000-square-foot concourse is planned south of the MSC North concourse with an elevated circulation corridor between the two concourses, up to eight aircraft gates, and associated utilities and airfield improvements.
8	Airport Metro Connector 96th Street Transit Station	2020 – 2024	A new multi-modal transportation center at 96th Street and Aviation Boulevard to connect LAX to the regional bus and transit system approved for construction by Metro. Components of the Airport Metro Connector (AMC) Station include three at-grade light rail transit (LRT) platforms, bus plaza, bicycle hub, pedestrian plaza, passenger vehicle pick-up and drop-off area and Metro transit center/terminal building ("Metro Hub") to connect passengers between the multiple transportation modes.
9	Terminal 6 Renovation	2020 – 2023	~~Proposed r~~ *R*eplacement or repair of aging infrastructure in order to enhance the passenger experience and improve amenities, such as upgrading the Security Screening Check Point and adding holdroom space and lounge areas, adding up to two gates, and reconfiguring existing aircraft gates and ramp area to improve operations.
10	*North Airfield Runway Status Lights*	*2023 - 2024*	*The FAA intends to upgrade runway status light components for the north airfield while various runway and taxiway surfaces are closed for construction. Runway status lights are fully automatic, advisory light system designed to reduce the number and severity of runway incursions and prevent runway accidents while not interfering with airport operations.*
N/A ~~10~~	Various Water Pipeline Projects	2020 – 2027	Includes replacement of domestic water pipelines throughout the CTA, replacement of chilled water and heating hot water pipelines feeding Terminal 1, and completion of recycled water pipelines on the LAX campus to receive and distribute reclaimed water to be produced at the Hyperion Water Reclamation Plant. Within the CTA, the recycled water pipelines will include stub-outs near Terminal 1.5 and Terminal 6 that will allow for future connections to the east. Some of these pipeline projects have been approved; environmental documentation for other projects is pending.

Table 3-1
Projects At/Adjacent to LAX

	Project	Expected Dates	Description
NA	Miscellaneous Projects and Improvements[2]	Ongoing	A wide variety of smaller miscellaneous projects and improvements mostly related to repair/replacement of, and upgrades to, existing facilities at LAX, including, but not limited to, runway repair/rehabilitation; elevators/escalators replacement; terminal taxilanes and aprons rehabilitation; passenger boarding bridge replacements; terminal electrical, plumbing, and facilities upgrades; utility infrastructure improvements; miscellaneous demolition; and other improvements.

Source: LAWA, ~~2020~~ *2021*.

Notes:

[1] There are no current proposals or plans regarding what types or amounts of development may occur on the parcels that would be available for other uses as a result of the LAX Landside Access Modernization Program (i.e., the Potential Future Related Development described in the EIR for the Landside Access Modernization Program). Further planning, assessment, and other efforts would be needed prior to any project being proposed on these parcels. Thus, particular uses and development are not reasonably foreseeable at this time. However, any future development would be required to be consistent with the provisions of the LAX Plan and LAX Specific Plan concerning the Airport Landside Support Subarea.

[2] These include discrete projects that are undertaken for general administration, maintenance, or state of good repair, and which do not require environmental review under CEQA. These include projects in various states of approval. None of these projects would be considered to have an individually noticeable effect on any environmental resource. However, these projects are accounted for in the cumulative air quality impacts analysis.

2. For reasons set forth in Response to Comment ATMP-PC038-3, Figure 3-1 on page 3-9 of the Draft EIR is hereby revised to add the North Airfield Runway Status Lights Project (Project 10). Please see the following revised figure.

Chapter 4, Environmental Impact Analysis

Section 4.1.1, Air Quality

Updates to Section 4.1.1 of the Draft EIR have been made to reflect several changes. For the reasons described in Item 22 under the heading Chapter 2, Description of the Proposed Project, above, the construction schedule was shifted to align with a Project start date of January 1, 2022, resulting in changes to the phasing analysis. In addition, as described in Item 1 under the heading Appendix C.10, Corrections and Clarifications to Appendix C.1 through C.9 of the Draft EIR, below, several changes were made to the air quality modeling inputs and assumptions. These changes resulted in revisions to the modeling results presented throughout the air quality analysis. These changes resulted in the corrections and clarifications to various text and tables in Section 4.1.1 of the Draft EIR below, unless otherwise indicated.

The changes in the air quality analysis did not result in any new significant impacts or increase the severity of a significant impact identified in the Draft EIR. With the refined analysis, impacts related to operational emissions of $PM_{2.5}$ would be less than significant. The Draft EIR had concluded that impacts related to operational emissions of $PM_{2.5}$ would be significant. Because the analysis now concludes that impacts related to operational emissions of $PM_{2.5}$ would be less than significant, text changes are made throughout the Draft EIR – particularly in Chapter 1, Section 4.4.1 (Air Quality), and Chapter 5 (Alternatives) – to reflect this revised conclusion.

1. The third sentence of the first paragraph on page 4.1.1-1 of the Draft EIR is hereby revised as follows:

> The analysis also addresses emissions from construction activities (e.g., on-site and off-site construction equipment, fugitive dust, and worker vehicle trips) that would occur during the construction period, which is anticipated to occur between ~~2021~~ *2022* and early 2028; and evaluates emissions associated with the temporary closure of a runway during construction.

2. For reasons set forth in Response to Comment ATMP-AL010-308, the last paragraph on page 4.1.1-2 of the Draft EIR is hereby revised as follows:

> Sulfate compounds (e.g., ammonium sulfate) are generally not emitted directly into the air ~~but are~~ *by construction or non-aircraft operational activities. Most atmospheric sulfate is* formed through various chemical reactions in the atmosphere; thus, sulfate is considered a secondary pollutant. All sulfur emitted by *non-aircraft* airport-related sources included in this analysis was assumed to be released and to remain in the atmosphere as SO_2. *Particulate sulfate emitted in aircraft exhaust is included in aircraft emissions and concentrations of PM_{10} and $PM_{2.5}$.* No *discrete* sulfate inventories or concentrations were estimated for the criteria air pollutant analysis because the relative abundance of sulfates from fuel combustion is much lower than that of SO_2, and because very little sulfur is emitted from Project sources.[5] ~~However, the trace amounts of sulfates identified in jet fuel~~ *The health effects of sulfates emissions* are assessed in Section 4.1.2, *Human Health Risk*.

3. The first sentence under Section 4.1.1.1.2.1 on page 4.1.1-5 of the Draft EIR is hereby revised as follows:

> Construction emissions were quantified for each year of construction, which is anticipated to occur over seven years between ~~2021~~ *2022* and 2028.

4. The last sentence under Section 4.1.1.2.1 on page 4.1.1-6 of the Draft EIR is hereby revised as follows:

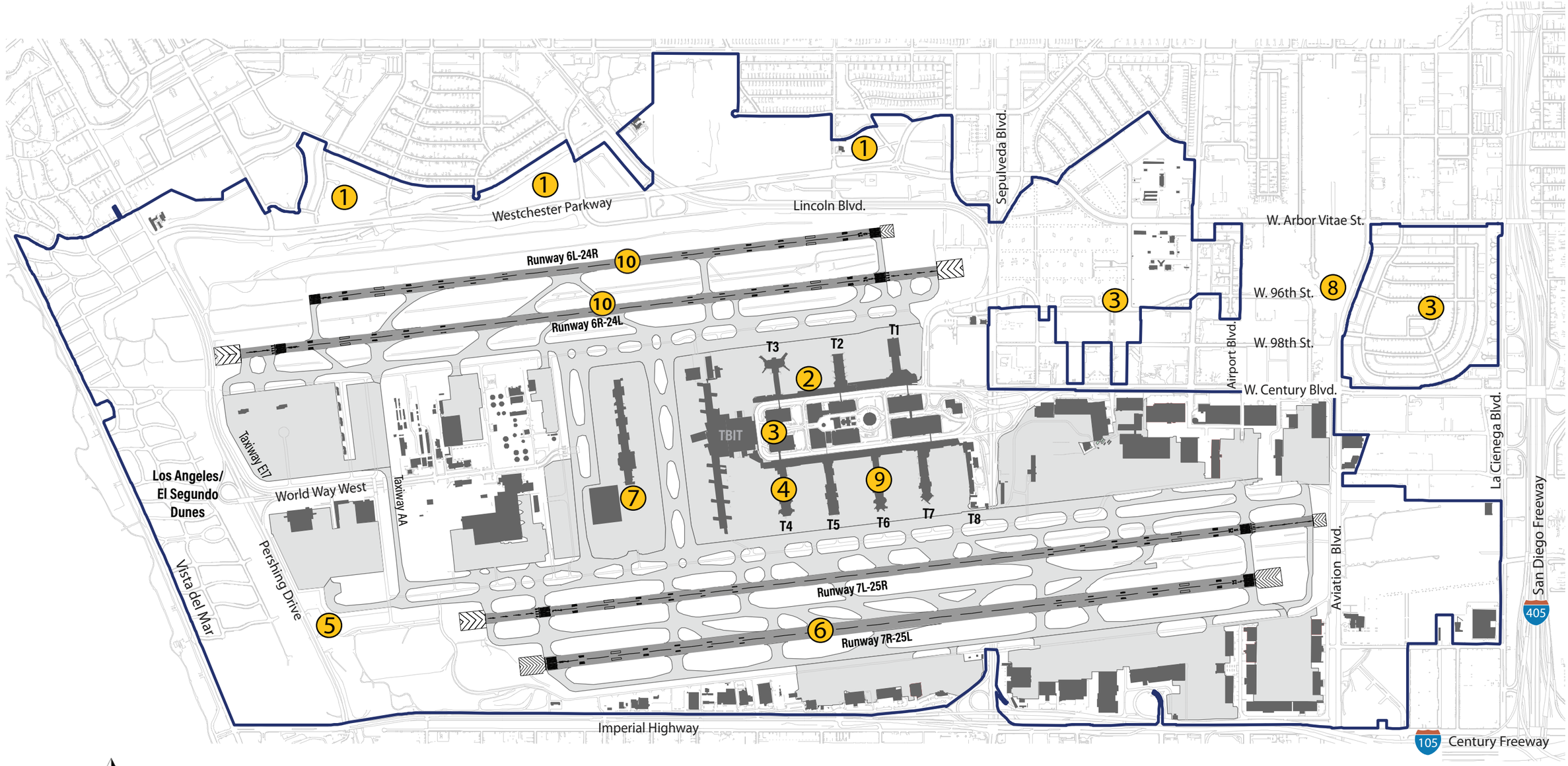
> As further described in Chapter 2, *Description of the Proposed Project*, construction of the proposed Project would occur over approximately seven years, projected to begin in ~~2021~~ *2022* and to end in 2028.

5. The fourth sentence under Section 4.1.1.2.1.1 on page 4.1.1-6 of the Draft EIR is hereby revised as follows:

> The proposed Project schedule assumes a single shift, 8-hour workday and a 5-day workweek *for the majority of construction activities* during the peak month of construction. *Certain construction activities may require more than one shift per workday, as identified in the proposed Project schedule in Appendix C.10.1 of this EIR.*

6. Footnote 38 on page 4.1.1-9 of the Draft EIR is hereby revised as follows:

> [38] As detailed in Section 2.3.1.2 of Chapter 2, *Description of the Proposed Project*, future growth in aviation activity at LAX is not dependent on, or driven by, the improvements associated with the proposed Project and, therefore, the aircraft activity would not differ between the With Project and Without Project future scenarios. *For purposes of this analysis, the Without Project scenario includes the same improvements and activity levels described in Section 5.4.2.1.*



0 2,318 4,365
Feet
Scale

Sources: Ricondo & Associates, Inc., April 2020 (basemap); Los Angeles World Airports, January 2020 (Airport Layout Plan); CDM Smith, April 2020 (Airport Property Line)

Prepared by: CDM Smith, July 2021

Legend

LAX Property Boundary

Project

Notes:

1. Numbers correspond to Table 3-1.
2. Projects not shown on the map occur at multiple locations within the airport (i.e., Various Water Pipeline Projects and Miscellaneous Projects and Improvements).

LAX Airfield and Terminal Modernization Project

Projects At/Adjacent to LAX

Figure
3-1

7. The second and third bullets on page 4.1.1-27 of the Draft EIR are hereby revised. The reason for these changes is to provide consistency with LAWA's Design and Construction Handbook. The revisions are as follows:

   - Trucks with a gross vehicle weight rating of 14,001 pounds shall be required to comply with USEPA 2010 emissions standards or next cleanest vehicle available, as approved by LAWA. In addition, off-road diesel-powered equipment *shall be* ~~are~~ required to meet USEPA Tier 4(final) standards or the next cleanest equipment available, as approved by LAWA, with some exceptions.
   - Material and debris haul trucks shall be *used that are* constructed, ~~or contents~~ covered, *or loaded* such that the material or debris does not *drop,* sift, blow, leak, spill, or otherwise escape from the vehicle.

8. The fifth bullet on page 4.1.1-27 of the Draft EIR is hereby revised. The reason for this change is to provide consistency with LAWA's Design and Construction Handbook. The revision is as follows:

   - Construction staging (*including loading/unloading of heavy construction materials* and parking of construction vehicles *[*including worker vehicles*]*) shall be prohibited on streets adjacent to schools, daycare centers, and hospitals.

9. The first sentence of the last paragraph on page 4.1.1-37 of the Draft EIR is hereby revised as follows:

   Table 4.1.1-6 presents the peak daily criteria pollutant emissions directly associated with construction activities for each year of construction (i.e., ~~2021~~ *2022* to 2028).

10. Table 4.1.1-6 on page 4.1.1-38 of the Draft EIR is hereby revised as follows:

Table 4.1.1-6
Peak Daily Criteria Pollutant Emissions from Project Construction Activities

Year	CO (lbs/day)	VOC (lbs/day)	NO_X (lbs/day)	PM_{10} (lbs/day)	$PM_{2.5}$ (lbs/day)	SO_X (lbs/day)
~~2021~~	~~121~~	~~11~~	~~41~~	~~7~~	~~3~~	~~<1~~
2022	~~309~~ *328*	~~26~~ *28*	~~102~~ *103*	~~15~~ *16*	~~6~~ *7*	1
2023	~~479~~ *259*	~~53~~ *23*	~~157~~ *91*	~~25~~ *16*	~~10~~ *6*	~~2~~ *1*
2024	~~483~~ *417*	~~58~~ *36*	~~160~~ *136*	~~23~~ *30*	10	~~2~~ *1*
2025	~~302~~ *295*	~~67~~ *35*	~~101~~ *96*	~~11~~ *9*	~~6~~ *5*	1
2026	~~93~~ *275*	~~21~~ *34*	~~30~~ *92*	~~6~~ *8*	~~2~~ *5*	~~<1~~ *1*
2027	~~96~~ *243*	~~8~~ *35*	~~31~~ *77*	~~3~~ *10*	~~2~~ *5*	~~<1~~ *1*
2028	~~1~~ *170*	~~<1~~ *29*	~~<1~~ *52*	~~<1~~ *6*	~~<1~~ *3*	~~<1~~ *1*
Peak Daily Emissions	~~483~~ *417*	~~67~~ *36*	~~160~~ *136*	~~25~~ *30*	10	~~2~~ *1*
Threshold	550	75	100	150	55	150
Exceeds Threshold?	**No**	**No**	**Yes**	**No**	**No**	**No**

Source: **Appendix C** of this EIR.

Key:
CO = carbon monoxide; lbs/day = pounds per day; NO_X = nitrogen oxides; PM_{10} = respirable particulate matter; $PM_{2.5}$ = fine particulate matter; SO_X = sulfur oxides; VOC = volatile organic compounds.

11. Table 4.1.1-8 on page 4.1.1-40 of the Draft EIR is hereby revised as follows:

Table 4.1.1-8
Total Direct and Indirect Construction-Related Criteria Pollutant Emissions

Year	CO (lbs/day)	VOC (lbs/day)	NO_X (lbs/day)	PM_{10} (lbs/day)	$PM_{2.5}$ (lbs/day)	SO_X lbs/day)
Peak Daily Direct Emissions	~~483~~ *417*	~~67~~ *36*	~~160~~ *136*	~~25~~ *30*	10	~~2~~ *1*
Peak Daily Incremental Indirect Emissions[a]	3,911	327	645	10	10	171
Total Peak Daily Emissions[b,c]	~~4,394~~ *4,329*	~~385~~ *363*	~~805~~ *781*	~~34~~ *40*	20	173
Threshold	550	75	100	150	55	150
Significant?	**Yes**	**Yes**	**Yes**	**No**	**No**	**Yes**

Source: **Appendix C** of this EIR.

Notes:
[a] Incremental indirect emissions are associated with temporary runway closures.
[b] Numbers may not add due to Peak Daily Direct and Peak Daily Indirect emissions occurring in different years.
[c] Numbers may not add due to rounding.

Key:
CO = carbon monoxide; lbs/day = pounds per day; NO_X = nitrogen oxides; PM_{10} = respirable particulate matter; $PM_{2.5}$ = fine particulate matter; SO_X = sulfur oxides; VOC = volatile organic compounds.

12. The second sentence of the last paragraph on page 4.1.1-41 of the Draft EIR is hereby revised as follows:

> As shown in the table, the emissions of the ozone precursor NO_X would be approximately *7.1* ~~7.0~~ times lower under the proposed Project construction peak day than the emissions modeled for the SJC Master Plan Amendment Draft EIR, while the VOC emissions associated with construction of the proposed Project would be approximately *6.5* ~~6.8~~ times higher.

13. Table 4.1.1-9 on page 4.1.1-41 of the Draft EIR is hereby revised as follows:

Table 4.1.1-9
Photochemical Modeling Pollutant Emissions

Pollutant	Emissions (lbs/day)		
	SJC Master Plan Amendment Draft EIR	IBEC Draft EIR	Proposed Project Peak Day Construction
NO_X	5,643	99	~~805~~ *781*
VOC	57	~100	~~385~~ *363*

Sources: City of San Jose, *Draft Environmental Impact Report for Amendment to Norman Y. Mineta San Jose International Airport Master Plan,* State Clearinghouse No. 2018102020, prepared by David J. Powers & Associates, Inc., November 2019. Available: https://www.sanjoseca.gov/Home/ShowDocument?id=44618; City of Inglewood, *Inglewood Basketball and Entertainment Center Project Draft Environmental Impact Report,* State Clearinghouse No. 2018021056, prepared by ESA and Fehr & Peers, December 2019. Available: https://www.cityofinglewood.org/1036/Murphys-Bowl-Proposed-NBA-Arena; **Appendix C** of this EIR.

Key:
NO_X = nitrogen oxides; VOC = volatile organic compounds

14. The second and third sentences of the second paragraph on page 4.1.1-42 of the Draft EIR are hereby revised as follows:

> As shown in the table, the emissions of ozone precursor NO_X would be approximately ~~8.1~~ *7.8* times higher under the proposed Project than the emissions modeled for the IBEC Draft EIR, while emissions of ozone precursor VOC would be approximately ~~3.9~~ *3.6* times higher than

those modeled for the IBEC Project. On a mass basis of total ozone precursors (NO_X plus VOC), the proposed Project peak day construction emissions would be more than ~~6.0~~ *5.7* times higher than the emissions modeled for the IBEC Draft EIR.

15. The first sentence of the third paragraph on page 4.1.1-42 of the Draft EIR is hereby revised as follows:

> If the proposed Project emissions were applied to the IBEC site, the resulting health impacts from ozone might be ~~6.0~~ *5.7* (total ozone precursor mass emission ratio) to ~~8.1~~ *7.8* (NO_X mass emission ratio) times higher than the IBEC results.

16. The second sentence of the fifth paragraph on page 4.1.1-42 of the Draft EIR is hereby revised as follows:

> Only peak daily NO_X emissions from direct construction activities would be significant for ~~four~~ *two* years of construction~~, including the two with the short-term runway closure periods~~.

17. Table 4.1.1-10 on page 4.1.1-45 of the Draft EIR is hereby revised as follows:

Table 4.1.1-10
Operational Emissions – 2028 With Project Compared to 2018 Baseline

Scenario	CO (lbs/day)	VOC (lbs/day)	NO_X (lbs/day)	SO_X (lbs/day)	PM_{10} (lbs/day)	$PM_{2.5}$ (lbs/day)
2018 Baseline						
Aircraft & APU	24,618	4,358	25,176	2,249	254	254
GSE	6,583	140	955	1	26	23
Traffic & Parking	24,138	825	4,559	63	2,555	813
Stationary	0	0	0	0	0	0
2018 Baseline Totals	55,339	5,323	30,690	2,314	2,834	1,090
2028 With Project						
Aircraft & APU	31,515	4,350	31,058	2,748	291	291
GSE	4,111	46	386	1	8	7
Traffic & Parking	~~15,820~~ *13,438*	~~448~~ *380*	~~1,735~~ *1,597*	~~59~~ *50*	~~3,192~~ *2,762*	~~970~~ *838*
Stationary	11	~~62~~ *7*	20	~~0~~ *<1*	1	1
2028 With Project Totals	~~51,456~~ *49,075*	~~4,906~~ *3,851*	~~33,199~~ *33,061*	~~2,808~~ *2,800*	~~3,492~~ *3,062*	~~1,268~~ *1,136*
Incremental Changes						
Aircraft & APU	6,897	(8)	5,882	499	37	37
GSE	(2,471)	(94)	(569)	0	(18)	(16)
Traffic & Parking	~~(8,319)~~ *(10,700)*	~~(377)~~ *(445)*	~~(2824)~~ *(2,962)*	~~(4)~~ *(13)*	~~638~~ *207*	~~157~~ *25*
Stationary	11	*7* ~~62~~	20	*<1* ~~0~~	1	1
Incremental Change Totals	~~(3,883)~~ *(6,264)*	~~(417)~~ *(667)*	~~2,509~~ *2,371*	~~495~~ *486*	~~658~~ *171*	~~178~~ *31*
Threshold	550	55	55	150	150	55
Significant?	**No**	**No**	**Yes**	**Yes**	**Yes**	***No*** ~~**Yes**~~

Source: **Appendix C** of this EIR.

Key:
APU = auxiliary power units; CO = carbon monoxide; GSE = ground support equipment; lbs/day = pounds per day; NO_X = nitrogen oxides; PM_{10} = respirable particulate matter; $PM_{2.5}$ = fine particulate matter; SO_X = sulfur oxides; VOC = volatile organic compounds~~;~~.

18. The first full paragraph on page 4.1.1-46 of the Draft EIR is hereby revised as follows:

> In summary, the total incremental emissions of NO_X, SO_X, *and* PM_{10}~~, and $PM_{2.5}$~~ from operation of the proposed Project (i.e., 2028 With Project emissions compared to 2018 Baseline emissions) would exceed the SCAQMD regional daily emission operational thresholds; incremental operational emissions of CO*,* ~~and~~ VOC*, and $PM_{2.5}$* would not exceed the thresholds. The exceedances of NO_X, SO_X, *and* PM_{10}~~, and $PM_{2.5}$~~ SCAQMD operational emission thresholds mean that the proposed Project's operational emissions would contribute to localized adverse health impacts of these pollutants described in Section 4.1.1.1. Therefore, the proposed Project's operational emissions of NO_X, SO_X, *and* PM_{10}~~, and $PM_{2.5}$~~ would result in a ***significant impact*** related to air quality.

19. The second and third sentences of the second full paragraph on page 4.1.1-46 of the Draft EIR are hereby revised as follows:

> These standards for NO_2, SO_2, *and* PM_{10}~~, and $PM_{2.5}$~~ are used as significance thresholds as described in Section 4.1.1.4 above. The operational impacts to ambient concentrations of NO_2, SO_2, *and* PM_{10}~~, and $PM_{2.5}$~~ are discussed in Section 4.1.1.5.4 below.

20. Table 4.1.1-11 on pages 4.1.1-46 and 4.1.1-47 of the Draft EIR is hereby revised as follows:

Table 4.1.1-11
Operational Emissions – 2028 With Project Compared to 2028 Without Project

Scenario	CO (lbs/day)	VOC (lbs/day)	NO_X (lbs/day)	SO_X (lbs/day)	PM_{10} (lbs/day)	$PM_{2.5}$ (lbs/day)
2028 Without Project						
Aircraft & APU	31,471	4,327	31,085	2,753	297	297
GSE	4,111	46	386	1	8	7
Traffic & Parking	~~15,557~~ *13,262*	~~440~~ *380*	~~1,721~~ *1,585*	~~58~~ *50*	~~3,135~~ *2,712*	~~953~~ *822*
Stationary	0	0	0	0	0	0
2028 Without Project Totals	~~51,140~~ *48,845*	~~4,813~~ *3,820*	~~33,193~~ *33,057*	~~2,812~~ *2,804*	~~3,440~~ *3,016*	~~1,256~~ *1,125*
2028 With Project						
Aircraft & APU	31,515	4,350	31,058	2,748	291	291
GSE	4,111	46	386	1	8	7
Traffic & Parking	~~15,820~~ *13,438*	~~448~~ *380*	~~1,735~~ *1,597*	~~59~~ *50*	~~3,192~~ *2,762*	~~970~~ *838*
Stationary	11	~~62~~ *7*	20	~~0~~ *<1*	1	1
2028 With Project Totals	~~51,456~~ *49,075*	~~4,906~~ *3,851*	~~33,199~~ *33,061*	~~2,808~~ *2,800*	~~3,492~~ *3,062*	~~1,268~~ *1,136*
Incremental Changes						
Aircraft & APU	43	23	(27)	(5)	(6)	(6)
GSE	0	0	0	0	0	0
Traffic & Parking	~~262~~ *176*	~~8~~ *<1*	~~14~~ *12*	~~1~~ *<1*	~~57~~ *50*	~~17~~ *16*
Stationary	11	~~62~~ *7*	20	~~0~~ *<1*	1	1
Incremental Change Totals	~~316~~ *230*	~~93~~ *31*	~~7~~ *5*	~~(4)~~ *(5)*	~~52~~ *46*	~~12~~ *10*
Threshold	550	55	55	150	150	55
Exceeds Threshold?[a]	No	~~Yes~~ *No*	No	No	No	No

Table 4.1.1-11
Operational Emissions – 2028 With Project Compared to 2028 Without Project

Scenario	CO (lbs/day)	VOC (lbs/day)	NO_X (lbs/day)	SO_X (lbs/day)	PM_{10} (lbs/day)	$PM_{2.5}$ (lbs/day)

Source: **Appendix C** of this EIR.

Note:

[a] As previously discussed, the 2028 With Project scenario was compared to the 2028 Without Project scenario for informational purposes; however, the level of significance of Project-related emissions was not determined using this comparison.

Key:
APU = auxiliary power units; CO = carbon monoxide; GSE = ground support equipment; lbs/day = pounds per day; NO_X = nitrogen oxides; PM_{10} = respirable particulate matter; $PM_{2.5}$ = fine particulate matter; SO_X = sulfur oxides; VOC = volatile organic compounds.

21. The first paragraph on page 4.1.1-47 of the Draft EIR is hereby revised. The change that identifies SO_X as an exception corrects an error in the Draft EIR. The other revisions are due to changes described in the introduction to this section. The revisions are as follows:

> As discussed in Section 4.8, *Transportation*, there would be a slight increase in VMT in the 2028 With Project scenario compared to the 2028 Without Project scenario due to an increase in employment at LAX with the addition of Concourse 0 and Terminal 9 and operation of the proposed roadway system. This growth would result in an increase in exhaust and fugitive dust emissions from motor vehicles. Because the daily number of aircraft operations would not change between the two scenarios, aircraft takeoff, climb-out, and landing emissions, as well as GSE emissions would remain the same in each scenario. Aircraft taxi and idle emissions on the ground would change somewhat as a result of the reconfigured runway exits, taxi path, and terminal gate configurations, and the substantial decommissioning of the West Remote Gates in the With Project scenario. Slight emission decreases would also occur from operation of the APUs with implementation of the proposed Project due to the availability of pre-conditioned air and gate power at the new Terminal 9 and Concourse 0 facilities. The combined effect of these changes in emission sources would result in an increase in all pollutant emissions, *except SO_X* (i.e., CO, VOC, NO_X, ~~SO_X,~~ PM_{10}, and $PM_{2.5}$), under the 2028 With Project scenario as compared to the 2028 Without Project scenario. The increases in traffic from additional employee travel under the With Project scenario, as well as stationary source emissions from the new terminal operations account for the majority of the increased emissions. ~~Although this analysis is presented for informational purposes only, as shown in Table 4.1.1-11, the incremental emissions from operation of the proposed Project compared to the 2028 Without Project scenario would exceed the SCAQMD significance threshold for VOC. This increase in VOC emissions would be associated primarily with emissions generated through the day-to-day operation of the new Terminal 9 and Concourse 0 facilities.~~

22. The second sentence of the first paragraph on page 4.1.1-48 of the Draft EIR is hereby revised as follows:

> As shown in the table, the emissions of ozone precursors NO_X, ~~and~~ VOC, *and $PM_{2.5}$* would be substantially less under the proposed Project than the emissions modeled for the SJC Master Plan Amendment Draft EIR~~, while the $PM_{2.5}$ emissions associated with the proposed Project would be 3.5 times higher~~.

23. Table 4.1.1-12 on page 4.1.1-48 of the Draft EIR is hereby revised as follows:

Table 4.1.1-12
Photochemical Modeling Pollutant Emissions

Pollutant	Emissions (lbs/day)		
	SJC Master Plan Amendment Draft EIR	IBEC Draft EIR	Proposed Project
NO_X	5,643	99	~~2,509~~ *2,371*
VOC	57	~100	~~(417)~~ *(667)*
$PM_{2.5}$	51	89	~~178~~ *31*

Sources: City of San Jose, *Draft Environmental Impact Report for Amendment to Norman Y. Mineta San Jose International Airport Master Plan,* State Clearinghouse No. 2018102020, prepared by David J. Powers & Associates, Inc., November 2019. Available: https://www.sanjoseca.gov/Home/ShowDocument?id=44618; City of Inglewood, *Inglewood Basketball and Entertainment Center Project Draft Environmental Impact Report,* State Clearinghouse No. 2018021056, prepared by ESA and Fehr & Peers, December 2019. Available: https://www.cityofinglewood.org/1036/Murphys-Bowl-Proposed-NBA-Arena; **Appendix C** of this EIR.

Key:
IBEC = Inglewood Basketball and Entertainment Center; lbs/day = pounds per day; NO_X = nitrogen oxides; $PM_{2.5}$ = fine particulate matter; SJC = Norman Y. Mineta San Jose International Airport; VOC = volatile organic compounds.

24. The first sentence of the second paragraph on page 4.1.1-48 of the Draft EIR is hereby revised as follows:

> If the proposed Project emissions were applied to the SJC site, the resulting health impacts from ozone *and $PM_{2.5}$* would likely be the same as, or less than, those modeled for the SJC Master Plan Amendment Draft EIR~~, and potentially 3.5 times higher from $PM_{2.5}$~~.

25. The second and third sentences of the third paragraph on page 4.1.1-48 of the Draft EIR are hereby revised as follows:

> As shown in the table, the emissions of ozone precursor NO_X would be ~~25~~ *24* times higher under the proposed Project than the emissions modeled for the IBEC Draft EIR, while emissions of ozone precursor VOC would be substantially lower than those modeled for the IBEC Project. The $PM_{2.5}$ emissions under the proposed Project would ~~be 2 times higher~~ *also be considerably lower* than those modeled for the IBEC Project.

26. The first sentence of the fourth paragraph on page 4.1.1-48 of the Draft EIR is hereby revised as follows:

> If the proposed Project emissions were applied to the IBEC site, the resulting health impacts from ozone would be ~~25~~ *24* times higher than the IBEC results, if one conservatively only considers NO_X and disregards the substantially lower incremental VOC emissions.

27. The second paragraph on page 4.1.1-49 of the Draft EIR is hereby revised as follows:

> As noted above, the proposed Project's operational emissions of NO_X, SO_X, *and* PM_{10}~~, and $PM_{2.5}$~~ would result in a ***significant impact*** related to air quality. Mitigation proposed to reduce significant impacts related to air pollutant operational emissions is provided below. Most of the mitigation measures identified would serve to reduce both criteria air pollutants (i.e., NO_X, SO_X, and PM_{10}~~, and $PM_{2.5}$~~) and GHG emissions, and are labeled accordingly.

28. The last sentence of the first paragraph on page 4.1.1-50 of the Draft EIR is hereby revised as follows:

> No additional feasible mitigation has been identified that would provide reduction of NO_X, SO_X, *or* PM_{10}, ~~or $PM_{2.5}$~~ emissions from operations.

29. The second and third sentences of the third paragraph on page 4.1.1-50 of the Draft EIR are hereby revised as follows:

> Based on motor vehicle emission factors applicable in 2028, this would result in a reduction of approximately 1.5 pounds per day for NO_X, 0.1 pound per day for SO_X, *and* 5.5 pounds per day for PM_{10}~~, and 1.7 pounds per day for $PM_{2.5}$~~. Comparing the reduction results with the incremental project emissions shown in Table 4.1.1-10 indicates that the mitigation would reduce operational emissions, but not below the level of significance for any of the criteria pollutants that were determined to be significant (i.e., NO_X, SO_X, *and* PM_{10}~~, and $PM_{2.5}$~~).

30. For the reasons set forth in Response to Comment ATMP-PC028-8 (i.e., related to the revision in the first sentence) and in the introductory paragraph to Section 4.1.1, Air Quality, above (i.e., related to the revisions in the second sentence), the first and second sentences of the fourth paragraph on page 4.1.1-50 of the Draft EIR are hereby revised as follows:

> With implementation of Mitigation Measures MM-AQ/GHG (ATMP)-3 through ~~7~~ *6,* and MM-T (ATMP)-1, significant impacts associated with operational emissions would be reduced, but not to a level that would be less than significant. Specifically, even with implementation of all feasible operations-related mitigation measures, the Project-related estimated incremental increases in daily operations-related emissions of NO_X, SO_X, *and* PM_{10}~~, and $PM_{2.5}$~~ would exceed the daily emission thresholds established by SCAQMD."

31. The first heading on page 4.1.1-58 of the Draft EIR is hereby revised to correct a typographical error as follows:

> **Quantification of Air Pollutant ~~Emissions~~ *Concentration* Reductions Associated with Mitigation**

32. The second full paragraph on page 4.1.1-58 of the Draft EIR is hereby revised as follows:

> MM-T (ATMP)-1 requires a reduction in daily employee VMT by the equivalent of 16,450 VMT. Based on motor vehicle emission factors applicable in 2028, this would result in a reduction of approximately 5.5 pounds per day for PM_{10} (about ~~one~~ *three* percent of the proposed Project incremental PM_{10} traffic emissions). ~~Comparing the reduction results with the incremental project emissions indicates that the mitigation would reduce operational emissions, but not~~ *This reduction would be distributed across the multitude of roadways accessing the airport and would not reduce peak localized impacts to* below the level of significance for PM_{10} concentrations.

33. Table 4.1.1-17 on page 4.1.1-59 of the Draft EIR is hereby revised as follows:

Table 4.1.1-17
Cumulative Construction Projects Peak Quarter Emissions Estimates (tons/quarter)

	Project		CO	VOC	NO_X	SO_X	PM_{10}	$PM_{2.5}$
No.[e]	Airfield and Terminal Modernization Project (Proposed Project)[a]	Direct Emissions	~~15.4~~ *12.8*	~~1.7~~ *1.1*	~~5.1~~ *4.1*	<0.1	~~0.8~~ *0.9*	0.3
		Total Direct and Indirect Emissions	~~197.7~~ *195.1*	~~17.3~~ *16.7*	~~36.2~~ *35.2*	7.8	1.5	0.9
1	LAX Northside Development		6.8	4.4	1.9	<0.1	1.0	0.3
2	Terminals 2 and 3 Modernization Project		5.8	2.2	3.4	<0.1	1.0	0.4
3	LAX Landside Access Modernization Program		4.7	0.3	5.0	<0.1	1.2	0.3
4	Terminal 4 Modernization Project		1.3	2.1	2.0	<0.1	1.2	0.3
5	LAX Airfield Bus Yard Facility		--- [b]	--- [b]	--- [b]	--- [b]	--- [b]	--- [b]

Table 4.1.1-17
Cumulative Construction Projects Peak Quarter Emissions Estimates (tons/quarter)

	Project	CO	VOC	NO_X	SO_X	PM_{10}	$PM_{2.5}$
6	Runway 7R-25L Rehabilitation	--- [b]	--- [b]	--- [b]	--- [b]	--- [b]	--- [b]
7	Midfield Satellite Concourse (MSC) South Project	3.5	0.4	1.3	<0.1	1.0	0.2
8	Airport Metro Connector 96th Street Transit Station	2.2	2.7	2.4	<0.1	0.5	0.3
9	Terminal 6 Renovation	18.2	0.5	2.6	<0.1	0.3	0.1
10	Various Water Pipeline Projects	--- [c]	--- [c]	--- [c]	--- [c]	--- [c]	--- [c]
NA	Miscellaneous Projects and Improvements	23.9	6.4	32.3	<1	4.2	1.7
Total from Other Construction Project Emissions		66.5	19.1	50.9	<1	10.4	3.6
Total Cumulative Construction Project Emissions		~~**264.2**~~ ***261.6***	~~**36.4**~~ ***35.8***	~~**87.1**~~ ***86.1***	**8.8**[d]	**11.9**	**4.5**
SCAQMD Construction Emission Significance Thresholds		24.75	2.5	2.5	6.75	6.75	2.5
Emissions Exceed SCAQMD Project-Level Threshold?		Yes	Yes	Yes	Yes	Yes	Yes

Sources: City of Los Angeles, Los Angeles World Airports, *Final Environmental Assessment Los Angeles International Airport (LAX) Receiving Station "X"*, Section 4.1 – Air Quality, June 2019; City of Los Angeles, Los Angeles World Airports, *Final Environmental Impact Report for Los Angeles International Airport (LAX) Northside Plan Update*, (SCH 2012041003), Section 4.2 – Air Quality, December 2014; City of Los Angeles, Los Angeles World Airports, *Final Environmental Impact Report for Los Angeles International Airport (LAX) Terminals 2 and 3 Modernization Project*, (SCH 2016081034), Section 4.1.1 – Air Quality, June 2017; City of Los Angeles, Los Angeles World Airports, *Final Environmental Impact Report for Los Angeles International Airport (LAX) Landside Access Modernization Program*, (SCH 2015021014), Section 4.2.1 – Air Quality, February 2017; City of Los Angeles, Los Angeles World Airports, *Final Negative Declaration for the Los Angeles International Airport Terminal 4 Modernization Project*, Section 4.3 – Air Quality, July 2020; City of Los Angeles, Los Angeles World Airports, *Final Environmental Impact Report for Los Angeles International Airport (LAX) Midfield Satellite Concourse*, (SCH 2013021020), Section 4.1 – Air Quality, June 2014; Los Angeles County Metropolitan Transportation Authority, *Airport Metro Connector 96th Street Transit Station Final Environmental Impact Report*, (SCH 2015021009), Section 3.1 – Air Quality, November 2016; and City of Los Angeles, Los Angeles World Airports, *Draft Initial Study / Negative Declaration - Los Angeles International Airport (LAX) Terminal 6 Renovation Project*, Section III – Air Quality, January 2020.

Notes:

[a] Project construction is estimated to occur from ~~2021~~ *2022* to 2028. Peak quarter emissions are presented in this table, which include direct construction emissions from on-site construction equipment and regional vehicle travel for material deliveries and worker trips, as well as indirect emission from aircraft during temporary runway closures to safely complete connections from the new taxiways to the north runways. Note that without the temporary runway closures, the SO_X emissions would be less than 0.1 ton in the peak quarter, and less than the significance thresholds for the total cumulative emissions.

[b] Based on the anticipated construction schedule, this project is not anticipated to result in overlapping construction emissions with the proposed Project during the estimated combined peak day, anticipated to occur in *2024* ~~2023~~.

[c] Various Water Pipeline Projects are accounted for in Miscellaneous Projects and Improvements.

[d] Note that without the temporary runway closures, the SO_X emissions would be less than 0.1 ton in the peak quarter, and less than the significance thresholds for the total cumulative emissions.

[e] Numbers correspond to Table 3-1 and Figure 3-1 in Chapter 3, *Overview of Project Setting*.

34. For reasons explained in the introduction to Section 4.1.1, Air Quality, above, the Impact 4.1.1-2 summary for Air Quality in Table 4.1.1-18 on pages 4.1.1-61 and 4.1.1-62 of the Draft EIR is hereby revised as follows:

Table 4.1.1-18
Summary of Impacts and Mitigation Measures Associated with the Proposed Project Related to Air Quality

Environmental Impacts	Impact Determination	Mitigation Measures	Level of Significance After Mitigation
Impact 4.1.1-2: Operation of the proposed Project would result in estimated incremental increases in operations-related emissions that are greater than the daily mass emission thresholds established by SCAQMD. This would be a ***significant and unavoidable impact*** for operations***.***	Construction: Not Applicable Operations: Significant (NO_X, SO_X, PM_{10}~~, $PM_{2.5}$~~)	Construction: Not Applicable Operations: MM-AQ/GHG (ATMP)-3. Parking Cool Roof. MM-AQ/GHG (ATMP)-4. EV Charging Infrastructure. MM-AQ/GHG (ATMP)-5. Electric Vehicle Purchasing. MM-AQ/GHG (ATMP)-6. Solar Energy Technology. MM-T (ATMP)-1. Vehicle Miles Traveled (VMT) Reduction Program.	Construction: Not Applicable Operations: Significant and Unavoidable (NO_X, SO_X, PM_{10}~~, $PM_{2.5}$~~)

Section 4.1.2, Human Health Risk

For reasons described in the Introduction to Section 4.1.1, Air Quality, above, changes were made to the air quality modeling inputs and assumptions, which resulted in revisions to the modeling results. Related changes were made to the human health risk assessment uncertainties analysis. This is the reason for the corrections and clarifications to the text in Section 4.1.2 of the Draft EIR identified below.

1. The following new subsection is hereby added at the end of Section 4.1.2.5.1.1 on page 4.1.2-16 of the Draft EIR.

> ***Uncertainties Associated with Changes in the Construction Schedule***
>
> *The HHRA originally evaluated an approximate 8-year construction period for the proposed Project, starting in mid-2021 and ending in 2028. However, in light of the status of the CEQA and the NEPA environmental reviews of the proposed Project, LAWA subsequently determined that a January 2022 start date was more reasonable than an April 2021 construction start date. The revised construction schedule scenario assumes that construction would start in 2022, but would still be completed in 2028, enabling operations to remain on schedule in 2028. Results of this additional analysis indicate that construction-related incremental cancer risks under the compressed construction schedule scenario would be* ***less than significant*** *for off-airport workers, residents, and school children. Supporting risk calculations that assess the impacts of the refined construction schedule are included in* ***Appendix C.6****.*

2. The following new subsection is hereby added at the end of Section 4.1.2.5.3.1 on page 4.1.2-22 of the Draft EIR.

> ***Uncertainties Associated with Changes in the Construction Schedule***
>
> *As noted in Section 4.1.1.5.1.1, the HHRA originally evaluated an approximate 8-year construction period for the proposed Project starting in mid-2021 and ending in 2028. However, in light of the status of the CEQA and the NEPA environmental reviews of the proposed Project, LAWA subsequently determined that a January 2022 start date was more reasonable than an April 2021 construction start date. The revised construction schedule scenario assumes that*

construction would start in 2022, but would still be completed in 2028, enabling operations to remain on schedule in 2028. Results of this additional analysis indicate that construction-related chronic non-cancer HI under the compressed construction schedule scenario would be ***less than significant*** *for off-airport workers and residents. Supporting risk calculations that assess the impacts of the refined construction schedule are included in* ***Appendix C.6****.*

Section 4.2, Cultural Resources (Historical Resources)

1. The first two full paragraphs on page 4.2-12 of the Draft EIR are hereby revised as follows:

> Evidence suggests that the property has a long historic association with training in the aircraft trades in service of the explosive post-World War II growth of the aerospace industry in Southern California. Constructed for civil defense training just eight months prior to the Japanese attack of Pearl Harbor, the property continued to be used for training in the aircraft trades following World War II. As such, ~~it appears~~ the property is eligible for the National Register,[21] California Register, and as a City of Los Angeles Historic-Cultural Monument as a rare intact example of an aircraft training facility from the 1940s and one of the oldest remaining buildings associated with aviation located in the vicinity of the airport.
>
> Only the rectangular bow-truss building appears to have retained sufficient integrity to convey the historic significance of the property. Because it *is* ~~appears~~ eligible for the National Register, California Register, and for local listing as a City of Los Angeles Historic-Cultural Monument, 9700 S. Sepulveda Boulevard is treated herein as a historical resource for the purposes of CEQA.
>
> [21] *Polanco, Julianne, State of California Department of Parks and Recreation, Office of Historic Preservation, State Historic Preservation Officer, Letter to David B. Kessler, U.S. Department of Transportation, Federal Aviation Administration, Western-Pacific Region Office of Airports, Environmental Protection Specialist, Re: Airfield and Terminal Modernization Project, Los Angeles International Airport, Los Angeles County, California, October 12, 2020.*

Section 4.3, Energy

For reasons described in the Introduction to Section 4.1.1, Air Quality, above, changes were made to the air quality modeling inputs and assumptions, which resulted in revisions to the modeling results. Conforming changes were also made to the energy analysis. Unless otherwise indicated, one or more of these changes to the modeling are the reason(s) for the corrections and clarifications to various text and tables in Section 4.3 of the Draft EIR identified below.

1. The sentence after the second full paragraph on page 4.3-2 of the Draft EIR is hereby revised. This change clarifies the data tables used in the analysis and is related to Response to Comment ATMP-PC040-1. The revision is as follows:

> Electricity demand associated with water consumption and wastewater generation was calculated by using energy intensity factors from CalEEMod *User's Guide Appendix D Default Data Tables*.

2. Table 4.3-2 on page 4.3-13 of the Draft EIR is hereby revised. The changes to the table are due, in large part, to an error in the Draft EIR that characterized some of the truck-related fuel use as gasoline instead of diesel. The error has been corrected, and the revised table correctly reflects diesel and fuel consumption. The changes to the table are also due, in part, to the shift in the construction schedule and phasing, such that construction would commence in January 2022, rather than April 2021, as explained above. The revised table is as follows:

Table 4.3-2
Construction Period Fuel Consumption and Energy Use

Year	Diesel Fuel (gallons)[1]	Gasoline Fuel (gallons)[1]	Total Energy Use (MMBtu)[2]
~~2021~~	~~295,824~~	~~76,982~~	~~50,681~~
2022	~~672,478~~ *698,440*	~~295,409~~ *126,485*	~~130,222~~ *111,679*
2023	~~1,079,595~~ *764,437*	~~677,180~~ *276,381*	~~234,361~~ *139,382*
2024	~~862,413~~ *1,195,163*	~~720,452~~ *333,218*	~~209,596~~ *205,623*
2025	~~507,566~~ *807,079*	~~458,685~~ *245,930*	~~127,679~~ *141,455*
2026	~~189,243~~ *630,720*	~~164,933~~ *215,009*	~~46,845~~ *113,382*
2027	~~100,569~~ *688,109*	~~90,604~~ *185,786*	~~25,263~~ *117,632*
2028	~~139~~ *214,238*	~~284~~ *69,950*	~~55~~ *37,881*
Total[3]	**~~3,707,826~~ *4,998,185***	**~~2,484,529~~ *1,450,760***	**~~824,702~~ *867,033***

Source: **Appendix C** of this EIR.

Notes:

[1] Fuel estimates derived from the construction GHG emissions analysis using U.S. Environmental Protection Agency, *Emission Factors for Greenhouse Gas Inventories*, March 9, 2018.

[2] Total energy use is the combined energy of the estimated diesel fuel use and gasoline fuel use converted to MMBtu for each year based on conversion factors published in the U.S. Energy Information Administration, *Monthly Energy Review*, Appendix A01, February 2020.

[3] Numbers may not add due to rounding.

3. For reasons described in Item 2 above, the first and second sentences of the second full paragraph on page 4.3-13 of the Draft EIR are hereby revised as follows:

> As shown in Table 4.3-2, diesel and gasoline fuel usage is estimated to increase during the first few years of construction, peak roughly ~~four~~ *three* years into the construction period, and then decline toward the end of the construction period. Construction of the proposed Project would consume an estimated ~~3,707,826~~ *4,998,185* gallons of diesel fuel and ~~2,484,529~~ *1,450,760* gallons of gasoline across all construction phases, representing a total energy use of approximately ~~824,702~~ *867,033* MMBtu.

4. Table 4.3-3 on page 4.3-15 of the Draft EIR is hereby revised. The reason for this change is to reflect revised modeling results using the appropriate CalEEMod demand factor for an enclosed parking structure with elevator for the Terminal 9 parking facility (i.e., the current energy demand factor as opposed to the historical factor, which was used in the Draft EIR). The revised table is as follows:

Table 4.3-3
Operational Electricity Consumption and Energy Use for Concourse 0 and Terminal 9

Component	Floor Area (square feet)[1]	Demand Factor (kWh per square foot per year)[2]	Estimated Electricity Demand (kWh per year)	Total Energy Use (MMBtu per year)[3]
Concourse 0	1,275,600	13.60	17,348,160	59,194
Terminal 9	1,413,600		19,224,960	65,598
Terminal 9 Parking Facility	700,000	~~6.74~~ *5.86*	~~4,718,000~~ *4,102,000*	~~16,098~~ *13,996*
Total			~~**41,291,120**~~ ***40,675,120***	~~**140,890**~~ ***138,788***

Source: CDM Smith, July ~~2020~~ *2021*.

Notes:

1 Floor area estimate includes a 20 percent increase to the planned floor area to account for design refinement (discussed in Chapter 2, *Description of the Proposed Project*). In order to provide a conservative estimate of electricity consumption, the floor area for the Terminal 9 parking facility assumes that the facility would be a multi-level parking garage. If the facility is a surface parking lot, electricity consumption would be lower.

2 For Concourse 0 and Terminal 9, an LAX-specific demand factor was used based on historic total electricity consumption at the Tom Bradley International Terminal averaged over calendar years 2016 and 2018. For the Terminal 9 parking facility, the CalEEMod Appendix D demand factor for enclosed parking structure with elevator was used. Energy consumption associated with the airfield improvements and the Terminal 9 APM Station, which would only be a boarding/deboarding platform, would be negligible.

3 Total energy use is the energy of the estimated electricity use converted to MMBtu. The value of 3,412 Btu per kilowatt-hour (kWh) is a constant; it is used as the thermal conversion factor for electricity retail sales and electricity imports and exports.

5. For reasons described in Item 4 above, the first full paragraph on page 4.3-15 of the Draft EIR is hereby revised as follows:

> As shown in Table 4.3-3, operation of Concourse 0 and Terminal 9, including the Terminal 9 parking facility, would consume approximately ~~41,291,120~~ *40,675,120* kWh of electricity per year. This would represent an annual energy use of approximately ~~140,890~~ *138,788* MMBtu per year.

6. Table 4.3-6 on page 4.3-18 of the Draft EIR is hereby revised as follows:

Table 4.3-6
Operational Vehicle and Transportation-Related Fuel Consumption and Energy Use

Year	Source	Fuel Type	Estimated Fuel Consumption (gallons per year)	Fuel Consumption Change Compared to Baseline (2018) Conditions (gallons per year)	Total Change in Energy Use (MMBtu per year)[2]
2028	Aircraft	Jet A	114,094,384	19,025,887	2,568,495
	APUs	Jet A	4,885,534	274,556	37,065
	GSE	Diesel	660,410	(348,318)	(47,852)
		Gasoline	964,874	(442,524)	(55,020)
	Motor Vehicles[1]	Diesel	~~7,647,825~~ *7,683,031*	~~(3,490,051)~~ *(3,454,845)*	~~(479,467)~~ *(474,630)*
		Gasoline	~~103,281,882~~ *86,996,635*	~~(7,955,903)~~ *(24,241,150)*	~~(989,184)~~ (3,013,983)

Source: CDM Smith, July ~~2020~~ *2021*.

Notes:

[1] Motor vehicles source includes all landside motor vehicle traffic, including LAX fleet vehicles, LAX employee vehicles, LAX passenger vehicles, shuttles, taxis, TNCs and all other on-road vehicles. Refer to Section 4.8, *Transportation,* for further analysis of vehicle traffic.

[2] Total energy use is the combined energy of the estimated fuel use converted to MMBtu based on conversion factors published in the U.S. Energy Information Administration, *Monthly Energy Review*, Appendix A01, February 2020.

7. The first sentence of the first full paragraph on page 4.3-18 of the Draft EIR is hereby revised as follows:

> As shown in Table 4.3-6, in 2028, aircraft would consume an estimated 114,094,384 gallons of Jet A, APUs would consume an estimated 4,885,534 gallons of Jet A, GSE would consume an estimated 660,410 gallons of diesel fuel and 964,874 gallons of gasoline, and motor vehicles would consume an estimated ~~7,647,825~~ *7,683,031* gallons of diesel fuel and ~~103,281,882~~ *86,996,635* gallons of gasoline.

Section 4.4, Greenhouse Gas Emissions

For reasons described in the Introduction to Section 4.1.1, Air Quality, above, changes were made to the air quality modeling inputs and assumptions, which resulted in revisions to the modeling results. Conforming changes were also made to the GHG analysis. Unless otherwise indicated, one or more of these changes to the modeling are the reason(s) for the corrections and clarifications to various text and tables in Section 4.4 of the Draft EIR identified below.

1. For reasons set forth in Response to Comment ATMP-AL010-305, the third paragraph on page 4.4-5 of the Draft EIR is hereby revised to clarify the modeling assumptions as follows:

> The parameters used to develop operational GHG emissions for these sources are the same as those outlined for the criteria air pollutant emissions analysis presented in Section 4.1.1.2. As described in that section, emissions from aircraft, which include emissions of GHG pollutants, were estimated using FAA's Aviation Environmental Design Tool Version 3b (AEDT 3b).[17] *For LAX, a mixing height of 1,806 feet above mean sea level was used in the emissions modeling to be consistent with calculations performed for the SCAQMD for aircraft emissions during preparation of the 2016 Air Quality Management Plan.*[18] AEDT calculates the GHG pollutant emissions for aircraft based on the landing-takeoff (LTO) cycle. For vehicular traffic, GHG pollutant emissions from the entire trip length, from the trip origin to LAX, were considered in

the analysis. Additionally, information on electrical demand is the same as that developed for the analysis in Section 4.3, *Energy*.

[18] *South Coast Air Quality Management District, Draft Aircraft Emissions Inventory for South Coast Air Quality Management District, prepared by Integra Environmental Consulting, Inc., Table 3.2.1, August 2016. Available: http://www.aqmd.gov/docs/default-source/planning/fbmsm-docs/aircraft-emissions-inventory-for-the-south-coast-air-quality-management-district.pdf.*

2. For reasons set forth in Response to Comment ATMP-AL010-172, Table 4.4-2 on page 4.4-25 of the Draft EIR is hereby revised as follows:

Table 4.4-2
2018 Existing Airport Operational GHG Emissions

Emission Source	CO_2e (MT/year)	Percent of Total
Aircraft	930,589	43
APUs	45,135	2
GSE	27,723	1
~~Stationary~~	~~97,397~~	~~5~~
Natural Gas Combustion	*28,834*	*1*
In-Basin Electrical Demand	*58,927*	*3*
On-Airport Vehicles	*9,637*	*<1*
Autos	1,020,793	47
Parking	30,186	1
TOTALS[1]	**2,151,823**	**100**

Source: **Appendix C** of this EIR.

Note:
[1] Numbers may not add due to rounding.

Key:
CO_2e = carbon dioxide equivalent; MT/year = metric tons per year

3. The first paragraph on page 4.4-27 of the Draft is hereby revised as follows:

Table 4.4-3 presents the GHG emissions inventory results for the construction activities, which would occur from ~~2021~~ *2022* through 2028. As shown, the annual estimated GHG emissions associated with Project construction would range from ~~1,639~~ *2,486* to ~~14,240~~ *12,408* MT of CO_2e ~~(with the exception of 2028, the final year of construction, when GHG emissions would only be 3 MT/year)~~. This year-to-year variation is largely attributable to the differences in project development timeframes and construction needs (see **Appendix C**). When summed, the proposed Project's total construction-related GHG emissions for the *7* ~~8~~-year construction period would be ~~50,827~~ *54,356* MT of CO_2e.

4. The second and third sentences of the third paragraph on page 4.4-27 of the Draft EIR are hereby revised as follows:

Total emissions from construction activities (~~50,827~~ *54,356* $MTCO_2e$), the closures of Runway 6L-24R (27,575 $MTCO_2e$), and the closure of Runway 6R-24L (28,651 $MTCO_2e$) would equal ~~107,053~~ *110,582* $MTCO_2e$. The total CO_2e amortized over the life of the proposed Project improvements (total emissions divided by 30) is equal to ~~3,568~~ *3,686* $MTCO_2e$ per year. These amortized construction emissions were added to the operational emissions in 2028, and the total was compared to the "no net increase" emissions threshold (see Section 4.4.5.1.2 below).

5. Table 4.4-3 on page 4.4-28 of the Draft EIR is hereby revised as follows:

Table 4.4-3
Construction-Related GHG Emissions for the Proposed Project

Emissions Source	Total CO_2e (MT/year)								Project Total CO_2e (MT)[1]
	~~2021~~	2022	2023	2024	2025	2026	2027	2028	
Off-Road, On-Site Equipment	~~2,145~~	~~4,812~~ *3,869*	~~8,286~~ *5,810*	~~7,224~~ *7,315*	~~4,752~~ *5,259*	~~1,815~~ *4,078*	~~959~~ *4,050*	~~1~~ *1,214*	~~29,995~~ *31,594*
On-Road, Off-Site Equipment	~~708~~	~~1,698~~ *1,916*	~~2,780~~ *1,323*	~~2,115~~ *2,697*	~~1,108~~ *1,129*	~~446~~ *1,037*	~~192~~ *926*	~~1~~ *295*	~~9,049~~ *9,323*
On-Road, On-Site Equipment	~~138~~	~~1,268~~ *520*	~~3,174~~ *1,768*	~~3,743~~ *2,396*	~~2,283~~ *2,869*	~~688~~ *2,168*	~~488~~ *2,741*	~~1~~ *977*	~~11,783~~ *13,439*
Total[1]	~~**2,992**~~	~~**7,778**~~ ***6,305***	~~**14,240**~~ ***8,901***	~~**13,082**~~ ***12,408***	~~**8,143**~~ ***9,257***	~~**2,949**~~ ***7,282***	~~**1,639**~~ ***7,717***	~~**3**~~ ***2,486***	~~**50,827**~~ ***54,356***

Source: **Appendix C** of this EIR.

Note:
[1] Numbers may not add due to rounding.

Key:
CO_2e = carbon dioxide equivalent; MT/year = metric tons per year

6. For the reasons set forth in Response to Comment ATMP-AL010-172 (i.e., related to the inclusion of results for individual stationary sources) and in the introductory paragraph to Section 4.1.1, Air Quality, above (i.e., related to the other revisions in the table), Table 4.4-5 on page 4.4-29 of the Draft EIR is hereby revised as follows, with a new footnote 3 added to clarify the modeling sources:

Table 4.4-5
Construction (Amortized) and Operational GHG Emissions for the Proposed Project as Compared to 2018 Baseline Conditions

Emission Source	Baseline Conditions (2018)		Proposed Project (2028)		Incremental Difference	
	MT/Yr CO_2e	Percent of Total	MT/Yr CO_2e	Percent of Total	MT/Yr CO_2e	Percent Change
Aircraft	930,589	43	1,142,950	~~48~~ *52*	212,362	22.8
APUs	45,135	2	48,941	2	3,806	8.4
GSE	27,723	1	19,626	1	(8,098)	(29.2)
~~Stationary~~	~~97,397~~	~~5~~	~~107,490~~	~~5~~	~~10,093~~	~~10.4~~
Natural Gas Combustion	*28,834*	*1*	*29,555*	*1*	*721*	*2.5*
Landscaping[3]	*n/a*	*n/a*	*<1*	*<1*	*<1*	*100*
Water Usage[3]	*n/a*	*n/a*	*3,862*	*<1*	*3,862*	*100*
Waste Generation[3]	*n/a*	*n/a*	*1,355*	*<1*	*1,355*	*100*
In-Basin Electrical Demand	*58,927*	*3*	*63,052*	*3*	*4,125*	*7.0*
Emergency Generator	*n/a*	*n/a*	*31*	*<1*	*31*	*100*
On-Airport Vehicles	*9,637*	*<1*	*9,637*	*<1*	*0*	*0*
Autos	1,020,793	47	~~1,005,382~~ *860,226*	~~43~~ *39*	~~(15,410)~~ *(160,567)*	~~(1.5)~~ *(15.7)*
Parking	30,186	1	~~28,742~~ *27,003*	1	~~(1,444)~~ *(3,183)*	~~(4.8)~~ *(10.5)*
Construction[1]	--	--	~~3,568~~ *3,686*	<1	~~3,568~~ *3,686*	100
TOTALS[2]	**2,151,823**	**100**	~~**2,356,700**~~ ***2,209,922***	**100**	~~**204,877**~~ ***58,099***	~~**9.5**~~ ***2.7***

Source: **Appendix C** of this EIR.

Notes:
Parentheses indicate negative values.

1 Construction-related GHG emissions, including incremental emissions related to runway closures, amortized over 30 years.

2 Numbers may not add due to rounding.

3 Emissions for baseline conditions in 2018 were obtained from the Airport Carbon and Emissions Reporting Tool (ACERT) used to calculated emissions for the 2018 Airport Carbon Accreditation program submission, while emissions for 2028 were estimated from CalEEMod. Because of the difference in emission calculation methods, the emission categories could not be exactly matched.

Key:
APU = auxiliary power unit; GSE = ground service equipment; CO_2e = carbon dioxide equivalent; MT/year = metric tons per year

7. The first sentence of the second paragraph on page 4.4-29 of the Draft EIR is hereby revised as follows:

> As shown in Table 4.4-5, incremental emissions in 2028 with implementation of the proposed Project would result a net increase in CO_2e of ~~204,877~~ *58,099* MT/year as compared to 2018 baseline conditions.

8. The third sentence of the second paragraph on page 4.4-29 of the Draft EIR is hereby revised as follows:

> The increased aircraft emissions would be partially offset by decreases in automobile (~~-15,410~~ *-160,567* MT), parking (~~-1,444~~ *-3,183*MT), and GSE (-8,098 MT) emissions.

9. The last sentence of the second full paragraph on page 4.4-30 of the Draft EIR is hereby revised as follows:

> Overall, GHG emissions with implementation of the proposed Project would be higher than without the Project, resulting in incremental increase of ~~21,273~~ *23,097* MT/year in 2028.

10. For the reasons set forth in Response to Comment ATMP-AL010-172 (i.e., related to the inclusion of results for individual stationary sources) and in the introductory paragraph to Section 4.1.1, Air Quality, above (i.e., related to the other revisions in the table), Table 4.4-6 on page 4.4-30 of the Draft EIR is hereby revised as follows, with a new footnote 3 added to clarify the modeling sources:

Table 4.4-6
Construction (Amortized) and Operational GHG Emissions for the Proposed Project as Compared to Future Without the Project

Emission Source	2028 Without Project		2028 With Project		Incremental Difference	
	MT/Yr CO_2e	Percent of Total	MT/Yr CO_2e	Percent of Total	MT/Yr CO_2e	Percent Change
Aircraft	1,143,999	49	1,142,950	~~48~~ *52*	(1,048)	(0.1)
APUs	50,253	2	48,941	2	(1,312)	(2.6)
GSE	19,626	1	19,626	1	0	0.0
~~Stationary~~	~~97,397~~	~~4~~	~~107,490~~	~~5~~	~~10,093~~	~~10.4~~
Natural Gas Combustion	*28,834*	*1*	*29,555*	*1*	*721*	*2.5*
Landscaping[3]	*n/a*	*n/a*	*<1*	*<1*	*<1*	*100*
Water Usage[3]	*n/a*	*n/a*	*3,862*	*<1*	*3,862*	*100*
Waste Generation[3]	*n/a*	*n/a*	*1,355*	*<1*	*1,355*	*100*
In-Basin Electrical Demand	*58,927*	*3*	*63,052*	*3*	*4,125*	*7.0*
Emergency Generator	*n/a*	*n/a*	*31*	*<1*	*31*	*100*
On-Airport Vehicles	*9,637*	*<1*	*9,637*	*<1*	*0*	*0*
Autos	995,885	43	~~1,005,382~~ *860,226*	~~43~~ *39*	~~9,497~~ *11,169*	~~1.0~~ *1.3*
Parking	28,268	1	~~28,742~~ *27,003*	1	~~474~~ *509*	~~1.7~~ *1.9*
Construction[1]	--	--	~~3,568~~ *3,686*	<1	~~3,568~~ *3,686*	100
TOTALS[2]	**2,335,427**	**100**	~~**2,356,700**~~ ***2,209,922***	**100**	~~**21,273**~~ ***23,097***	~~**0.9**~~ ***1.0***

Source: **Appendix C** of this EIR.

Notes:
Parentheses indicate negative values.

[1] Construction-related GHG emissions, including incremental emissions related to runway closures, amortized over 30 years.

[2] Numbers may not add due to rounding.

[3] *Emissions for 2028 Without Project were assumed to be the same as baseline conditions in 2018 (see Table 4.4-2). Because of the difference in emission calculation emissions between baseline conditions and 2028 With Project (see Note 3 on Table 4.4-5), the emission categories could not be exactly matched.*

Key:
APU = auxiliary power unit; GSE = ground service equipment; CO_2e = carbon dioxide equivalent; MT/year = metric tons per year

11. The second paragraph on page 4.4-31 of the Draft EIR is hereby revised as follows:

> As shown in Table 4.4-5, with implementation of the proposed Project, LAX-related annual GHG emissions would be ~~2,356,699~~ *2,209,922* MT of CO_2e in 2028, an increase of ~~204,877~~ *58,099* MT compared to baseline (2018) GHG emissions. This represents a ~~9.5~~ *2.7* percent increase over baseline GHG emissions at LAX.

12. For reasons set forth in Response to Comment ATMP-AL010-187, the following text is inserted as a new paragraph on page 4.4-38 of the Draft EIR, immediately before the concluding paragraph of Section 4.4.5.2.1:

> *Because construction and operation of the proposed Project would result in a net increase in GHG emissions, the proposed Project is not consistent with the GHG emission reduction targets set forth in the Green New Deal and the Sustainable City pLAn, as noted in Table 4.4-7.*

Section 4.6, Land Use and Planning

1. Goal 7 in Table 4.6-1 on page 4.6-23 of the Draft EIR is hereby revised to correct a typographical error as follows:

Table 4.6-1
Project Consistency with Applicable Goals in the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal)

Goal	Plan Inconsistency?
Goal 7: Adapt to a changing climate and support an integrated regional development pattern and transportation network	No inconsistency. The proposed Project would support an integrated regional development pattern and transportation network by adding a new APM station serving Terminal 9. Connecting to the APM would support the goal by ensuring that the development of Terminal 9 is connected to the regional transportation network via the APM. The proposed Project would not be inconsistent with the goal of adapting to a changing climate. All Project-related on-road medium- and heavy-duty vehicles at LAX would comply with LAWA's Alternative Fuel Vehicle Requirement. In addition, airlines that operate GSE related to Concourse 0 and Terminal 9 would comply with LAWA's GSE Emissions Policy, which would reduce GHG emissions. Moreover, the new Concourse 0 and Terminal 9 would be designed to achieve the USGBC's LEED® Silver certification and construction vehicles and equipment would comply with LAWA's Design and Construction Handbook requirements pertaining to clean equipment. Thus, the Project would not be inconsistent with Goal *7* ~~5~~. In addition, as noted above and outlined in Section 4.4, *Greenhouse Gas Emissions,* the proposed Project includes mitigation measures that would reduce GHG emissions, which would aid the airport in adapting to climate change.

2. The second row under the heading **Noise** in Table 4.6-5 on page 4.6-32 of the Draft EIR is hereby revised. The reason for this revision is to clarify that Terminal 9 has not been previously approved and to identify the number of proposed gates in the same manner as the Project Description. The revisions are as follows:

Table 4.6-5 Project Consistency with Applicable Policies in the LAX Plan	
Policy/Program	**Plan Inconsistency?**
Circulation and Access	
P2. Update facilities, gates, and runways, to accommodate the New Large Aircraft (NLA) and the next generation of quieter jets.	No inconsistency. The westerly extension of Taxiway D would be designed with ADG VI separation from Taxiway E, and the accompanying new vehicle service road south of the Taxiway D extension would be designed at ADG VI separation from Taxiway D. In association with Concourse 0, the easterly extension of Taxiway E would be designed as an ADG V/restricted ADG VI taxiway. Terminal 9 is *planned* ~~previously approved~~ as a 12-*to 18*-gate international and domestic terminal facility with capability to support ADG VI operations. In addition, in association with Terminal 9, the easterly extension of Taxiway C would be designed at ADG VI separation from Taxiway B, and the relocated vehicle service would be designed at ADG VI separation from Taxiway C.

Section 4.7.1, Aircraft Noise

1. The fourth sentence of the second paragraph on page 4.7.1-13 of the Draft EIR is hereby revised to correct a typographical error as follows:

> Both studies identified a correlation linking noise to cardiovascular disease, but due to limitations in the studies and the potential for alternative explanations of *causal* ~~casual~~ associations, both studies recommended that further research be done to better understand and strengthen the causal interpretation of the relationship between aircraft noise and cardiovascular disease.

2. The first sentence on page 4.7.1-39 of the Draft EIR is hereby revised as follows:

> Construction of the improvements in the north airfield (i.e., enabling projects, taxiway extensions, and reconfigured runway exits) would occur from approximately *2022* ~~2021~~ through *2026* ~~2025~~, with the runway exits constructed in 2023 and 2024.

Section 4.7.3, Construction Traffic and Equipment Noise and Vibration

1. For reasons described in Item 22 under the heading Chapter 2, Description of the Proposed Project, above, the second paragraph on page 4.7.3-5 of the Draft EIR is hereby revised as follows:

> It is anticipated that the majority of construction activities would occur during daytime hours (i.e., typically between 7:00 a.m. and 3:30 p.m.). It is likely that there could be some limited periods when construction activities are scheduled to occur both during the daytime and nighttime hours, as second and third shifts would be used for work activities that cannot normally be accomplished during the daytime shift. Examples of such activities include, but are not limited to, large-scale pours of concrete when it would be necessary to maintain a continuous stream of concrete deliveries and placement through multiple shifts, ~~or~~ when it is safer and more efficient to complete airfield improvement work late at night when aircraft activity levels are very low*, or as otherwise needed to complete specific activities within an overall schedule for a proposed Project component*.

2. Table 4.7.3-1 on pages 4.7.3-5 and 4.7.3-6 of the Draft EIR is hereby revised. The reason for this change is to correct an error related to the noise levels associated with background conditions. The correct noise levels were included in Table 4.7.3-6 of the Draft EIR and were used to determine if Project-related noise from construction staging areas would be significant. As a result, the changes to Table

4.7.3-1 do not alter the conclusions in the Draft EIR relative to construction noise impacts from construction staging areas. The revised table is as follows:

Table 4.7.3-1
Existing Conditions at Construction Noise-Sensitive Receptors

ID	Receiver Location	Background Conditions CNEL (dB*A*)[1]	Land Use Setting
Construction Activity Receptors			
R1	Residential development in Playa del Rey	67.8	Residential north of airport
R2	Saint Bernard High School	67.7	High school in a residential area north of airport
R3	Residential development along southern edge of Westchester	68.4	Residential north of airport
R4	Park West Apartments on Lincoln Boulevard	66.3	Residential north of airport
R5	Residential uses along West 88th Street near Liberator Ave	67.9	Residential north of airport
R6	Residential uses near Westchester Parkway and Kittyhawk Ave	72.0	Residential north-east of airport
R7	Residence Inn by Marriott Los Angeles LAX/Century Boulevard	70.2	Commercial east of airport
R8	Sheraton Gateway Los Angeles Hotel	69.3	Commercial east of airport
R9	H Hotel Los Angeles/Homewood Suites by Hilton Los Angeles International Airport	70.4	Commercial east of airport
R10	Hyatt Regency Los Angeles International Airport	73.4	Commercial east of airport
R11	Courtyard Los Angeles LAX/Century Boulevard	71.7	Commercial east of airport
Construction Staging Area Receptors			
S1	*Residential development along southern edge of Westchester* ~~This receptor is the same as Receptor R3~~	*68.6*	*Residential north of airport*
S2	*Park West Apartments on Lincoln Boulevard* ~~This receptor is the same as Receptor R4~~	*67.8*	*Residential north of airport*
S3	Residential uses along West 88th Street near Sepulveda Westway	68.2	Residential north of airport
S4	Residential uses along Lilienthal Avenue near Airport Blvd	71.1	Residential north-east of airport
S5	Residential uses north of Arbor Vitae St between Airport Blvd and Bellanca Ave	74.0	Residential north-east of airport
S6	Renaissance Los Angeles Airport Hotel	68.*0*	Commercial east of airport
S7	*H Hotel Los Angeles/Homewood Suites by Hilton Los Angeles International Airport* ~~This receptor is the same as Receptor R9~~	*69.3*	*Commercial east of airport*
S8	Residential uses within Del Aire near Aviation Blvd	*66.1* ~~65.9~~	Residential south of airport

Source: **Appendix F.3** of this EIR.

Note:
[1] Background condition obtained through AEDT.

3. Mitigation Measure MM-CN (ATMP)-1, Construction Noise Control Plans, in Section 4.7.3.5.2.2 on page 4.7.3-21 of the Draft EIR is hereby revised. The reasons for these changes are to specify the noise-sensitive receptors that may be subject to significant impacts, to add a requirement for noise measurements to verify the efficiency of construction noise attenuation measures, and to provide the

correct basis for determining the requirement for construction noise attenuation measures. The revisions are as follows:

- **MM-CN (ATMP)-1. Construction Noise Control Plans.**

  LAWA shall require *all prime* construction contractors working on the landside access (i.e., roadway) improvements, the Concourse 0 improvements, and the Terminal 9 improvements, including the Terminal 9 APM station, to develop noise control plans to address construction equipment noise at noise-sensitive receptors where construction noise impacts may be significant. *Such noise-sensitive receptors include the Residence Inn by Marriott Los Angeles LAX/Century Boulevard, Sheraton Gateway Los Angeles Hotel, H Hotel/Homewood Suites by Hilton Los Angeles International Airport, Hyatt Regency Los Angeles International Airport, and Courtyard Los Angeles LAX/Century Boulevard. (Note: Those are the hotel names/chains as of October 2020. This mitigation requirement still applies to those facilities if the names/chains subsequently change).* The noise control plans shall be approved by LAWA prior to implementation. The noise control plans shall calculate the total maximum noise level (in CNEL) associated with construction of ~~the~~ *each* Project component, as well as cumulative noise impacts that account for Project-related activities that would occur concurrently with construction of other Project components and construction of other nearby LAX projects. If the calculated construction-related noise levels indicate an increase of 5 dBA over the *existing* ~~baseline~~ exterior noise level at any noise-sensitive receptor, the noise control plan shall specify provisions and/or measures to be implemented during construction that will attenuate construction noise levels to be less than 5 dBA over the *existing* ~~baseline~~ exterior noise level. *The noise control plans shall include a section describing noise monitoring equipment, locations, and methods for establishing a representative existing exterior noise level.* Potential noise attenuation measures could include, but are not limited to, noise curtains, noise blankets, temporary sound walls, or their equivalent during construction. The noise control plans shall include a provision that states that, if noise levels exceed the 5 dBA increase, LAWA will require the contractor to implement additional noise attenuation measures until the noise increase is less than 5 dBA. *To verify efficiency of the construction noise attenuation measures, noise measurements shall be taken at the closest noise-sensitive receptors to confirm that the attenuated construction noise levels are less than 5 dBA over the existing exterior noise level.*

4. The third full sentence at the top of page 4.7.3-22 of the Draft EIR is hereby revised. The reason for this change is to provide the correct basis for determining the requirement for construction noise attenuation measures. The revision is as follows:

   The proposed mitigation measure provides a performance standard that construction noise levels shall not exceed 5 dBA over the *existing* ~~baseline~~ exterior noise level at the time of construction and provides a number of feasible options for attaining this standard.

Section 4.8, Transportation

1. The text in the first, second, and fourth bullets under the heading **VMT Reduction Strategies** in Mitigation Measure MM-T (ATMP)-1 on pages 4.8-52 through 4.8-54 of the Draft EIR is hereby revised. The reasons for these changes are set forth in Topical Response TR-ATMP-T-2. These clarifications do not require any changes to the transportation analysis and do not alter the results or conclusions of the transportation analysis. The revisions are as follows:

   - **Expand LAWA's Rideshare Program** – Currently, LAWA's rideshare program serves LAWA's employees and results in a 13.4 percent commute mode share for the vanpool program and additional participation in carpool~~s~~ *matching, transit trip planning, and a guaranteed ride*

home program.[57] The LAX employee population currently has a 5.5 percent commute mode share for vanpools.[58] Expanding the LAWA program to all LAX employees, with a corresponding expansion of vans in service to meet the increased demand, is expected to produce a similar ~~vanpool~~ mode share *for rideshare programs* as is currently seen for LAWA employees. Vanpools are a flexible strategy that accommodate a variety of shift schedules and residential locations, ideal for a large workforce such as that of the LAX campus. Furthermore, vanpools were a frequently-requested program in the 2016 Employee Travel Study of Los Angeles International Airport, which surveyed employees across LAX of all types. When applied to the entire LAX employee pool, this would result in an increase in vanpool mode share for LAX employees of 7.9 percent, representing a shift from employees driving alone to employees driving with others in a vanpool. Additional participation in carpools would also be anticipated as a result of this strategy. Based on the strategy description above, total VMT reduction from this strategy is estimated to be over 60,000 daily employee VMT. This assumes new vanpool riders shift from drive-alone mode share (80 percent of LAX employees) and each van carries six employees (driver plus passengers).

- ***Through the LAX Transportation Management Organization, Work with Employers on an ~~Formalize~~ Employee Telecommuting Program*** – ~~Eligible employees across all employers on the LAX campus shall be allowed to telecommute through a formalized work-from-home program.~~ *The LAX Transportation Management Organization will encourage and provide support, advice, and guidance to employers across the LAX campus in implementing telecommuting programs.* Recognizing that LAWA job requirements are not fully representative of all LAX employees, most of whom need to be on-site to fulfill their job duties, a review of job titles across the LAX campus was conducted, resulting in an estimate that four percent of all jobs across LAX could be completed at least partially from home. Based on research related to telecommute programs, a telecommute program that enables an average of 1.5 days per week to be spent working from home, with a four percent eligibility, would result in a 0.88 percent reduction in VMT from the employment site.[59] Based on these assumptions, total VMT reduction from this strategy is estimated to be over 7,000 daily employee VMT.
- **Provide On-demand Micro-Transit Shuttle** – Relative to employee VMT reduction, LAWA is currently engaged in the development of an employee shuttle in partnership with the City of Inglewood, and a separate pilot program in partnership with Metro. The expansion of these pilot programs into full programs, and the expansion of the service area beyond the City of Inglewood and the Metro service area, would result in additional reduction of single-occupancy commute trips to LAX from the nearby neighborhoods. Based on a review of employee residential locations, nine percent of employees at LAX live within five miles of the airport. Based on research related to private employee shuttles serving employment centers, an estimated 27 percent of the employees within the service area who would have driven alone would switch to a shuttle if it existed.[60] Based on these assumptions, total VMT reduction from this strategy is estimated to be over 4,700 daily employee VMT. If the service

[57] Los Angeles World Airports SCAQMD Filing, August 2019, as reported via email from M. Molina, LAWA, to P. Adams, LAWA on May 21, 2020.

[58] City of Los Angeles, Los Angeles World Airports, *Employee Travel Study of Los Angeles International Airport*, prepared by Point C, updated July 2016.

[59] Cambridge Systematics, *Moving Cooler: An Analysis of Transportation Strategies for Reducing Greenhouse Gas Emissions,* Technical Appendices, prepared for the Urban Land Institute (p. B-54). As reported in the California Air Pollution Control Officers Association, *Quantifying Greenhouse Gas Mitigation Measures*, page 237, 2010. Available: http://capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf.

[60] Handy, Lovejoy, Boarnet, Spears, *Impacts of Transit Service Strategies on Passenger Vehicle Use and Greenhouse Gas Emissions,* 2013.

area were expanded to a radius of 10 miles or farther, additional employees with longer commute trip lengths would be expected to switch to using the shuttle, resulting in additional VMT reduction. Micro-transit systems can, as an option, be set up as point-to-point shuttles different from van pools by utilizing larger vehicles, some with amenities, having a dedicated driver, with passenger pick-ups and drop-offs at designated hubs (instead of individual homes).

Long-term, these pilot programs can serve as examples of service options that can be expanded into a full program that is available to both employees and passengers, which would result in reduction of private vehicle trips to LAX from passengers who live in the nearby neighborhoods. Based on a review of originating passenger residential locations, three percent of passengers live in neighborhoods within five miles of the airport.[61] Based upon research related to private employee shuttles serving employment centers, which is the best available corollary to this type of passenger micro-transit shuttle, an estimated 27 percent of passengers within the service area who would otherwise drive alone would switch to a shuttle if it existed.[62] If the service area were expanded to a radius of 10 miles, additional passengers with longer trip lengths would be expected to switch to using the shuttle.

- **Market and Promote Alternative Transportation Options** – Promotions, marketing, and online trip-planning tools shall be implemented to promote alternative options to get to and from LAX using modes other than a private vehicle. Relative to employee VMT, LAWA currently engages, through its Rideshare program *and the LAX Transportation Management Organization*, in marketing and promoting alternative options to get to LAX using modes other than a private vehicle. There is opportunity to increase the frequency and diversify the format of marketing and promotions to LAWA employees, increase the number of LAX employees that receive marketing and promotions communications through the expansion of the Rideshare program, and enhance the relevance of existing sources of information such as online trip-planning tools. Promotions and marketing that encourage employees to change their commute habits, including periodic incentives to participate (such as Earth Day promotions), in conjunction with the increasing number of non-auto options to get to LAX in the future, would be anticipated to further reduce employee VMT. Based on available research, the VMT reduction potential from this strategy is grouped with the expansion of the rideshare program, and no additional VMT reductions are assumed to be produced from this strategy in isolation.[63]

  Relative to passenger VMT reduction, LAX does not currently engage in comprehensive marketing and promotions for alternative options to get to and from LAX using modes other than a private vehicle; therefore, there are certain aspects of marketing and promotion that could, as part of the proposed VMT Reduction Program, be expanded. Online trip-planning tools, such as Google Maps and Metro's trip planner, offer ways for a passenger to get to LAX via public transit or alternative modes. These tools, however, require a passenger to seek out proactively that information. Promotions and marketing that capture passengers' attention at all stages of the trip-making process, in conjunction with the increasing number

61 Unison Consulting. *2019 Passenger Survey – Los Angeles International Airport*, October 18, 2019. Available: https://www.lawa.org/-/media/lawa-web/lawa-our-lax/studies-and-reports/lax_survey_final_report_2019.ashx.

62 Handy, Lovejoy, Boarnet, Spears, *Impacts of Transit Service Strategies on Passenger Vehicle Use and Greenhouse Gas Emissions*, 2013.

63 California Air Pollution Control Officers Association, *Quantifying Greenhouse Gas Mitigation Measures,* page 242, 2010. Available: http://capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf.

of non-auto options to get to LAX in the future, would be anticipated to reduce passenger VMT.[64]

2. The text under the heading **Basis for Determining Mitigation Requirement Has Been Achieved** on page 4.8-57 of the Draft EIR is hereby revised. The reason for these changes is set forth in Topical Response TR-ATMP-T-2. These clarifications do not require any changes to the transportation analysis and do not alter the results or conclusions of the transportation analysis. The revisions are as follows:

> Monitoring and reporting on the effectiveness of the VMT reduction strategies would occur on an annual basis, beginning *one year after* ~~upon~~ initial operation of Concourse 0 or Terminal 9, *whichever is operational first*. ~~Upon completion and operation of both facilities,~~ t*T*he annual monitoring shall be such that, if the VMT per employee performance goal of 20.4 or VMT equivalent is achieved for *five* ~~three~~ consecutive years, the VMT mitigation requirement for the proposed Project will be considered to have been achieved.

3. Table 4.8-15 on page 4.8-60 of the Draft EIR is hereby revised. The reason for this change is that an error was made in entering data into the Synchro model. The error has been corrected, and data regarding queue lengths is being revised to reflect the modeled results. The revised table is as follows:

Table 4.8-15
Summary of Freeway Ramp Queueing Analysis for Existing Conditions, Projected Future Conditions Baseline (2028), and Proposed Project (2028)

Location	Ramp Storage Length (feet)	Time Period	Existing Conditions (2019)		Projected Future Conditions Baseline (2028)		Proposed Project (2028)	
			95th Percentile Queue Length (ft)	Substantial Effect?	95th Percentile Queue Length (ft)	Substantial Effect?	95th Percentile Queue Length (ft)	Substantial Effect?
I-405 Northbound Century Boulevard Off-Ramp	1,260	AM	325	No	~~375~~ *400*	No	~~400~~ *425*	No
		PM	275	No	~~425~~ *300*	No	~~425~~ *300*	No

Source: Fehr and Peers, ~~2020~~ *2021*.

Chapter 5, Alternatives

For reasons described in the Introduction to Section 4.1.1, Air Quality, above, changes were made to the air quality modeling inputs and assumptions, which resulted in revisions to the modeling results. Conforming changes were also made to the alternatives analysis. Unless otherwise indicated, one or more of these changes to the modeling are the reason(s) for the corrections and clarifications to various text and tables in Chapter 5 of the Draft EIR identified below.

1. The Emissions (Operations) row of the Air Quality section of Table 5-1 on page 5-2 of the Draft EIR is hereby revised as follows:

[64] National Academies of Sciences, Engineering, and Medicine, *Traveler Response to Transportation System Changes Handbook, Third Edition*: Chapter 19, Employer and Institutional TDM Strategies, Table 19-1, 2010. Washington, DC: The National Academies Press. Available: http://www.trb.org/Publications/Blurbs/163781.aspx.

Table 5-1 Summary of Impacts - Proposed Project			
Resource Category[1]	**Proposed Project (Before Mitigation)**	**Mitigation Proposed**	**Proposed Project (After Mitigation)**
Air Quality and Human Health Risk			
Air Quality			
Emissions (Operations)	Significant (NO_x, SO_x, PM_{10}, ~~$PM_{2.5}$~~)	Yes	Significant and Unavoidable (NO_x, SO_x, PM_{10}, ~~$PM_{2.5}$~~)

2. Table 5-2 on page 5-10 of the Draft EIR is hereby revised as follows:

Table 5-2 Alternative Construction Approach (Reduce Daily Activity Duration) Air Pollutant Emissions			
Pollutant	**SCAQMD Threshold (lbs/day)**	**Proposed Project Peak Daily Emissions (lbs/day)**	**Amount (%) of Reduction Required to Avoid Significant Impacts**
CO	550	~~4,247~~ *4,329*	87%
NO_X	100	781	87%
VOC	75	~~373~~ *363*	~~80%~~ *79%*
SO_X	150	~~166~~ *173*	~~10%~~ *13%*
PM_{10}	150	~~34~~ *40*	NA
$PM_{2.5}$	55	20	NA
Source: **Appendix C** of this EIR. Key: CO = carbon monoxide; lbs/day = pounds per day; NO_X = nitrogen oxides; PM_{10} = respirable particulate matter; $PM_{2.5}$ = fine particulate matter; SO_X = sulfur oxides; VOC = volatile organic compounds.			

3. The second sentence of the first paragraph on page 5-11 of the Draft EIR is hereby revised as follows:

> Daily activities would need to be reduced by approximately ~~88~~ *87* percent, which would limit daily construction activities to approximately 1.2 hours within what would otherwise be a 10-hour work day or 2.9 hours within what would otherwise be a 24-hour work day.

4. The seventh bullet on page 5-15 of the Draft EIR is hereby revised. The reason for this change is that Terminal 6 received approval under NEPA subsequent to publication of the Draft EIR. The revisions are as follows:

> - **Terminal 6 Renovation.** Terminal 6 improvements include upgrading the Security Screening Check Point, adding holdroom space and lounge areas, adding up to two gates, and reconfiguring existing aircraft gates and ramp area to improve operations. The Terminal 6 Renovation project has been approved ~~by the LAWA Board of Airport Commissioners, and is currently undergoing FAA review.~~ *and f*~~F~~uture implementation of this project is not dependent on the proposed Project.

5. For reasons described in Item 3 under the heading Chapter 1, Introduction and Executive Summary, above, the fifth sentence of the first paragraph on page 5-21 of the Draft EIR is hereby revised as follows:

At the high end of the range for Terminal 9 (i.e., 18 narrowbody gates), 15 of the 18 West Remote Gates would be removed or decommissioned and, similar to the proposed Project, three of the West Remote Gates would remain *in operation* ~~to provide operational flexibility~~.

6. For reasons described in Item 3 under the heading Chapter 1, Introduction and Executive Summary, above, the text of the bullet on page 5-26 of the Draft EIR is hereby revised as follows:

   - **Removal/Replacement of West Remote Passenger Gates.** Under Alternative 4, nine existing west remote passenger gates would be removed and an additional six west remote passenger gates would be decommissioned. Three of the existing west remote passenger gates would remain *in operation* ~~for operational flexibility, as they would under the proposed Project~~.

7. The second paragraph on page 5-29 of the Draft EIR is hereby revised as follows:

   As discussed in Section 4.1.1, *Air Quality*, the proposed Project would result in significant and unavoidable emissions of NO_X, SO_X, *and* PM_{10}~~, and $PM_{2.5}$~~ associated with operational activities.

8. The first sentence of the last paragraph on page 5-29 of the Draft EIR is hereby revised as follows:

   As discussed in Section 4.1.1, *Air Quality*, the Without Project scenario would result in significant and unavoidable emissions of NO_X, SO_X, *and* PM_{10}~~, and $PM_{2.5}$~~ associated with operational activities.

9. The seventh and eighth sentences of the first paragraph on page 5-30 of the Draft EIR are hereby revised as follows:

   The Without Project scenario would result in significant and unavoidable emissions of NO_X, SO_X, *and* PM_{10}~~, and $PM_{2.5}$~~ compared to baseline conditions. Thus, it is expected that operations-related impacts of The No Project Alternative with respect to regional emissions of NO_X, SO_X, *and* PM_{10}~~, and $PM_{2.5}$~~ would be ***significant and unavoidable***.

10. The first sentence at the top of page 5-32 of the Draft EIR is hereby revised as follows:

    The No Project Alternative would be anticipated to have significant and unavoidable impacts with respect to regional emissions of NO_X, SO_X, *and* PM_{10}~~, and $PM_{2.5}$~~ from operations.

11. The second full paragraph on page 5-53 of the Draft EIR is hereby revised as follows:

    Alternative 2 would include all proposed Project components except for Terminal 9 and its associated facilities, including the Terminal 9 parking facility and APM station. As discussed in Section 4.1.1, *Air Quality*, operation of the proposed Project would result in significant and unavoidable regional emissions of NO_X, SO_X, *and* PM_{10}~~, and $PM_{2.5}$~~. These operations-related emissions would be driven by increased aircraft activity that would occur irrespective of the Project. Thus, as with the proposed Project, it is expected that operations-related impacts with respect to regional emissions of NO_X, SO_X, *and* PM_{10}~~, and $PM_{2.5}$~~ under Alternative 2 would be ***significant and unavoidable***.

12. The last paragraph on page 5-67 of the Draft EIR is hereby revised as follows:

    Alternative 3 would include all proposed Project components except for Concourse 0. As discussed in Section 4.1.1, *Air Quality*, operation of the proposed Project would result in significant and unavoidable regional emissions of NO_X, SO_X, and PM_{10}~~, and $PM_{2.5}$~~. These operations-related emissions would be driven by increased aircraft activity that would occur irrespective of the Project. Thus, as with the proposed Project, it is expected that operations-related impacts with respect to regional emissions of NO_X, SO_X, and PM_{10}~~, and $PM_{2.5}$~~ under Alternative 3 would be ***significant and unavoidable***.

13. The third paragraph on page 5-81 of the Draft EIR is hereby revised as follows:

> Alternative 4 would include all of the proposed Project components except that it would implement LAMP Phase 2 roadway improvements in place of the proposed Project roadway improvements. As discussed in Section 4.1.1, *Air Quality*, operation of the proposed Project would result in significant and unavoidable regional emissions of NO_X, SO_X, *and* PM_{10}~~, and $PM_{2.5}$~~. These operations-related emissions would be driven by increased aircraft activity that would occur irrespective of the Project. Although Alternative 4 has a different roadway system than the proposed Project, regional traffic emissions are anticipated to be comparable between the scenarios. Thus, as with the proposed Project, it is expected that operations-related impacts of Alternative 4 with respect to regional emissions of NO_X, SO_X, *and* PM_{10}~~, and $PM_{2.5}$~~ would be ***significant and unavoidable***.

14. The Emissions (Operations) row of the Air Quality section of Table 5-15 on page 5-97 of the Draft EIR is hereby revised as follows:

Table 5-15
Summary Comparison of Impacts Associated with the Proposed Project and Alternatives

Resource Category[1]	Proposed Project (After Mitigation)	Alternative 1: No Project	Alternative 2: Concourse 0 Only	Alternative 3: Terminal 9 Only	Alternative 4: LAMP Roadway Improvements plus Terminal 9 Access
Air Quality and Human Health Risk					
Air Quality					
Emissions (Operations)	Significant and Unavoidable (NO_X, SO_X, PM_{10}~~, $PM_{2.5}$~~)	Significant and Unavoidable (NO_X, SO_X, PM_{10}~~, $PM_{2.5}$~~)	Significant and Unavoidable (NO_X, SO_X, PM_{10}~~, $PM_{2.5}$~~)	Significant and Unavoidable (NO_X, SO_X, PM_{10}~~, $PM_{2.5}$~~)	Significant and Unavoidable (NO_X, SO_X, PM_{10}~~, $PM_{2.5}$~~)

Chapter 6, Other Environmental Considerations

1. For reasons explained in the introduction to Section 4.1.1, Air Quality, above, the second bullet on page 6-1 of the Draft EIR is hereby revised as follows:

   - Operational emissions (Project-related and cumulatively considerable contributions) of the following pollutants:
     - NO_X
     - SO_X
     - Respirable particulate matter (PM_{10})
     - ~~Fine particulate matter ($PM_{2.5}$)~~

2. For reasons described in Item 22 under the heading Chapter 2, Description of the Proposed Project, above, the first sentence on page 6-4 of the Draft EIR is hereby revised as follows:

> Development of the proposed Project would generate construction jobs between years *2022* ~~2021~~ and 2028.

3. The third sentence on page 6-7 of the Draft EIR is hereby revised. The reasons for these changes are to correct a typographical error and an omission. The revisions are as follows:

The Initial Study for the proposed Project, included as Appendix A of this EIR, also determined, for the reasons explained therein, that additional effects, including effects on the following resource areas, would result in no impact, or less than significant impacts: aesthetics, agricultur*e*~~al~~ and forestry resources, biological resources, *cultural resources (archaeological resources),* geology and soils, hydrology and water quality, mineral resources, population and housing, public services, recreation, tribal cultural resources, and wildfire.

F3.3 Corrections and Clarifications to the Draft EIR Appendices

Appendix B, Activity Forecasts and Operational Analyses

Appendix B.2, Operational Analyses Report

1. The second bullet under Section 3.4 on page 3-4 of Appendix B.2 of the Draft EIR is hereby revised. The reason for this revision is set forth in Responses to Comments ATMP-AL010-38 and ATMP-AL010-58. The revision is as follows:

    - With Project—representing future-year conditions with LAX Airfield and Terminal Modernization Project improvements to include a west extension of Taxiway D, the reconfiguration of Runway 6L-24R exit taxiways, Concourse 0 and Terminal 9, and associated taxiway/taxilane improvements *(including the easterly extension of Taxiway C)*

Appendix C, Air Quality, Human Health Risk Assessment, Greenhouse Gas Emissions, and Energy

Appendix C.6, Human Health Risk Assessment Technical Report

For reasons described in the Introduction to Section 4.1.1, Air Quality, above, changes were made to the air quality modeling inputs and assumptions, which resulted in revisions to the modeling results. Related changes were made to the human health risk assessment uncertainties analysis. Unless otherwise indicated, this is the reason(s) for the corrections and clarifications to the text and tables in Appendix C.6 of the Draft EIR identified below.

1. Page ii of the Table of Contents of Appendix C.6 of the Draft EIR is hereby revised to add the following subsection:

    5.5.4 Uncertainties Associated with Changes in the Construction Schedule

2. Page iii of the Table of Contents of Appendix C.6 of the Draft EIR is hereby revised to add the following attachment:

    Attachment 4 Risk and Hazard Calculations for Uncertainty Analysis of Changes in Construction Schedule

3. Table 3-1 on page 3-2 of Appendix C.6 of the Draft EIR is hereby revised to correct a typographical error. The correct value was accounted for in the Draft EIR Human Health Risk analysis. The revised table is as follows:

Table 3-1 On-Airport Construction TOG and PM_{10} Emissions for the Proposed Project

Averaging Period	PM_{10}				TOG			Comments
	Diesel Engine Exhaust	Gasoline Engine Exhaust	Fugitive Dust	Tire & Brake Wear	Diesel Engine Exhaust	Gasoline Engine Exhaust	Paving & Coating	
Peak Daily (lbs)	5.84	0.05	18.78	0.72	36.25	1.26	47.64	Used for Acute Non-Cancer Health Hazard
Peak Annual (tons)	0.53	0.01	1.88	0.07	3.24	0.13	4.33	Used for Chronic Non-Cancer Health Hazard
Average for *7* ~~14~~ year Construction Period (tons/year)	0.21	<0.01	0.62	0.03	NA	0.05	1.08	Used for Cancer Risk

Notes:
PM_{10} = Particulate matter less than or equal to 10 microns in diameter
TOG = Total organic gases

4. Footnote 64 on page 5-2 of Appendix C.6 of the Draft EIR is hereby revised to correct a typographical error as follows:

> [64] U.S. Environmental Protection Agency, *Policy Assessment for the Review of the National Ambient Air Quality Standards for Particulate Matter*, EPA-452/R-20-002, *2020* ~~2000~~. Available: https://www.epa.gov/sites/production/files/2020-01/documents/final_policy_assessment_for_the_review_of_the_pm_naaqs_01-2020.pdf.

5. The following new subsection is hereby added following page 5-11 (i.e., Figure 5-3) of Appendix C.6 of the Draft EIR:

5.5.4 Uncertainties Associated with Changes in the Construction Schedule

The HHRA originally evaluated an approximate 8-year construction period for the proposed Project, starting in 2021 and ending in 2028. However, in light of the status of the CEQA and the NEPA environmental reviews of the proposed Project, LAWA subsequently determined that a January 2022 start date was more reasonable than an April 2021 construction start date. The revised construction schedule scenario assumes that construction would start in 2022, but would still be completed in 2028, enabling operations to remain on schedule in 2028.

The revised construction schedule has the potential to alter the human health risk calculations because human receptors have different exposure parameters depending on the age range they are at the time of exposure. These exposure parameter differences recognize that exposures among infants, toddlers, adolescents, and teenagers can vary significantly from adults due to their physiological and toxicodynamic differences.

As shown in Table 4-3 and discussed in Section 4.1.2 in the Draft EIR, the calculated incremental cancer risks for the evaluated receptors (off-airport residents, workers, and students) were estimated to be negative for all receptors, except for the off-airport worker. In addition, all calculated incremental cancer risks for the evaluated receptors in the Draft EIR were estimated to be below the threshold of significance of 10 in 1 million. The negative values indicate that, compared to 2018 baseline conditions, the proposed Project would result in decreases of some TAC concentrations (most notably diesel particulate matter, or DPM), which would thereby result in decreases in cancer risk estimates, producing beneficial impacts for receptors.

As calculated in the Draft EIR, over 90 percent of the cancer risk is driven by DPM. DPM is primarily emitted from diesel construction equipment, haul trucks, and concrete trucks. DPM emissions from on-road trucks, shuttle trips, and airport GSE would be lower under the proposed Project than under 2018 baseline conditions, producing the reduction in cancer risk. Because the cancer risks estimated for the proposed Project are driven by DPM, evaluation of the revised construction schedule scenario focused on the changes in DPM emissions. Other TAC were not remodeled for the evaluation of this scenario.

The DPM annual concentrations were recalculated for each of the construction years starting in 2022. These revised annual DPM concentrations were used to calculate the construction related DPM contribution to incremental cancer risk and chronic non-cancer hazards. The revised DPM cancer risks and chronic hazards were combined with the original risks and hazards from all other construction-related TACs provided in the Draft EIR to estimate the total construction risks and hazards due to the revised construction schedule.

*Peak cancer risks for the revised construction schedule scenario are presented in **Table 5-4**. Calculations are presented in **Attachment 4**. The results show slightly higher cancer risks for the off-airport worker and the child resident. As shown, risks would still be below the threshold of significance of 10 in 1 million. Changes in the calculated MEI peak cancer risks and non-cancer health hazards for the other receptors are negligible.*

Given the minor differences in the calculated chronic risks and hazards, the comparison to CalOSHA limits and acute hazards were not calculated for the revised construction schedule scenario. The 8-hour concentrations for the proposed Project in the Draft EIR ranged from a few to several orders of magnitude below PELs for all TAC (Section 4.1.1, Table 4-1), and changes in the construction schedule are highly unlikely to increase these concentration estimates to be above CalOSHA limits. Similarly, even if 1-hour concentrations for the proposed Project as presented in the Draft EIR were doubled or tripled, the acute non-cancer health hazards would still be less than the threshold of one (Section 4.1.3, Table 4-4).

Table 5-4 Incremental Cancer Risks for Maximally Exposed Individuals from Proposed Project Construction Based on a Compressed Construction Scenario

Receptor Type	Incremental Cancer Risks[1] (per million people)
	Construction[2,3]
	Unmitigated
Off-Airport Worker, 25 years	6
Adult Resident, 70 years[4]	-2
Adult Resident, 30 years	-1
Child Resident, 9 years	0.5
School Child, 12 years[5]	-0.2
Receptor Type	**Incremental Non-Cancer Chronic Hazards[6]**
	Construction[7]
	Unmitigated
Residential	0.08
Commercial	0.3

Source: CDM Smith, 2021. (**Attachment 4**, Table 4-1)
Notes:
1 Values provided are changes in the number of cancer cases per million people.
2 See text for detailed explanation. DPM concentrations in these calculations were modeled for a compressed schedule from 2022 to 2028; all other TAC concentrations were used as modeled in the Draft EIR. Following construction, it was assumed that, beginning in 2028, construction and operations would be overlapping, with operations continuing through the remainder of the receptors' exposure periods (30 years for adult residents, 25 years for adult workers, 12 years for school children, and 9 years for child residents). Starting in 2028, receptors would be exposed to incremental 2028 With Project operations-related TAC as compared to 2018 baseline operations.
4 Although the 30-year residential scenario was used for the significance determination, the 70-year residential scenario was also calculated to determine cancer burden for evaluation of population-wide risks discussed in Section4.2.
5 The MEI value for the school child cancer risk is at a residential/commercial grid location and not at an existing school location. The highest estimated cancer risk for school children at an existing school is estimated to be -0.3 in 1 million for construction at Cowan Avenue Elementary School (the school at grid point 176).
6 Hazard indices (HI) are unitless.
7 Total chronic HI is shown for the peak construction year of 2023.

6. A new attachment, Attachment 4, is hereby added to the end of Appendix C.6 of the Draft EIR. The new attachment is provided in Attachment F2 of this Final EIR (Appendix C.10.6).

Appendix C.10, Corrections and Clarifications to Appendix C.1 through C.9 of the Draft EIR

1. A new section of Appendix C, Appendix C.10, is hereby added to the end of Appendix C of the Draft EIR. Appendix C.10 incorporates the following updates to the air quality, greenhouse gas, human health risk, and energy analyses presented in the Draft EIR. (1) The construction schedule was shifted to align with a Project start date of January 1, 2022. The reason for this change is because LAWA reevaluated the construction start date for the proposed Project in light of the status of the CEQA and the NEPA environmental reviews of the proposed Project, including extensions of the public comment periods, and determined that a January 2022 start date was more reasonable than an April 2021 construction start date. As a result of this change, the phasing analysis was updated, resulting in changes to the start and completion dates of various project elements. Construction would still be completed in 2028. (2) For the reasons set forth in Response to Comment ATMP-PC035-73, the total Project square footage, including auxiliary office space, as detailed in Chapter 2 of the Draft EIR, was included for all Project construction calculations including fugitive volatile organic compound (VOC) emissions associated with architectural coatings. (3) For the reasons set forth in Response to Comment ATMP-PC035-73, fugitive VOC emissions calculations associated with construction architectural coatings were updated to use comparable South Coast Air Quality Management District

(SCAQMD) Rule 1113 limits for architectural coating VOC concentrations (100 grams VOC per liter of coating) rather than the maximum allowable U.S. Environmental Protection Agency (USEPA) limit (250 grams VOC per liter of coating), which had been used in the Draft EIR calculations. (4) Fugitive VOC emissions calculations associated with operational consumer product (such as cleaning agents) usage were updated to reflect SCAQMD and California Air Resources Board (CARB) rules for VOC limits. The fugitive VOC emission factors replaced the outdated factors in CalEEMod. (5) Assumptions related to Project-related elevated roadways, including roadway designations and corresponding silt loading factors, were revised to reflect that these roadways are limited-access roadways (i.e., roads with limited cross traffic). (6) Following publication of the Draft EIR, the ground access (i.e., traffic) mode splits and distribution were refined based on more detailed assumptions. Accordingly, emissions associated with airport ground access (traffic) operations were also revised.

These changes resulted in revisions to the modeling results presented throughout the air quality, human health risk, GHG, and energy analyses. The new section of Appendix C, which reflects the revised modeling results, is provided in Attachment F2 of this Final EIR.

Appendix G, Transportation

Appendix G.9, Freeway Safety Analysis

1. The following table is hereby added as the first page of Appendix G.9. The table shows turning volumes associated with the freeway safety analysis, as revised. The reason for this addition is to provide the summarized turning volumes, as corrected, associated with the detailed Synchro worksheets presented in the appendix. The values in the table shown in strikeout represent the volumes used in the original Draft EIR analysis and the values in the table shown in italics and underline are the corrected values. The reason for the corrections to the turning volumes is set forth in Response to Comment ATMP-AL010-255.

Table 1
Northbound I-405 and Century Boulevard off-ramp Revised Turning Volumes

Scenario	Peak Hour	NBL	NBR	EBR	EBL	EBT	WBT	WBR
Existing Conditions (2019 Counts)	AM	1,177	308	189	18	510	1,652	7
	PM	518	394	557	20	1,750	790	10
Projected Future Baseline Conditions (2028)	AM	~~1,284~~ *1,350*	~~14~~ *310*	~~189~~ *190*	~~18~~ *20*	~~1,152~~ *900*	~~1,968~~ *2300*	~~7~~ *10*
	PM	~~1,148~~ *660*	~~38~~ *400*	~~557~~ *580*	20	~~2,056~~ *2,240*	~~1,479~~ *1,200*	10
Proposed Project Conditions (2028)	AM	~~1,310~~ *1,380*	~~11~~ *310*	~~189~~ *190*	~~18~~ *20*	~~1,159~~ *910*	~~1,998~~ *2,330*	~~7~~ *10*
	PM	~~1,163~~ *680*	~~28~~ *400*	~~557~~ *580*	20	~~2,154~~ *2,340*	~~1,505~~ *1,230*	10

2. The freeway queuing analysis Synchro worksheets for Project Future Baseline Conditions – AM (2028), Project Future Baseline Conditions – PM (2028), Proposed Project – AM (2028), and Proposed Project – PM (2028) in Appendix G.9 have been revised. Please see the following revised Synchro worksheets.

Lane Group	EBT	EBR	WBT	NBL	NBR
Lane Group Flow (vph)	1010	188	2473	1517	348
v/c Ratio	0.56	0.30	1.28	0.82	0.40
Control Delay	24.0	4.7	159.6	21.4	12.5
Queue Delay	0.0	0.0	0.0	0.0	0.0
Total Delay	24.0	4.7	159.6	21.4	12.5
Queue Length 50th (ft)	177	0	~682	329	97
Queue Length 95th (ft)	229	51	#794	397	148
Internal Link Dist (ft)	861		179		
Turn Bay Length (ft)					
Base Capacity (vph)	1816	632	1925	1964	915
Starvation Cap Reductn	0	0	0	0	0
Spillback Cap Reductn	0	0	0	0	0
Storage Cap Reductn	0	0	0	0	0
Reduced v/c Ratio	0.56	0.30	1.28	0.77	0.38

Intersection Summary

~ Volume exceeds capacity, queue is theoretically infinite.
Queue shown is maximum after two cycles.

95th percentile volume exceeds capacity, queue may be longer.
Queue shown is maximum after two cycles.

Lane Group	EBT	EBR	WBT	NBL	NBR
Lane Group Flow (vph)	2393	544	1290	767	465
v/c Ratio	0.90	0.55	0.46	0.61	0.80
Control Delay	26.1	4.2	13.8	25.0	34.9
Queue Delay	0.0	0.0	0.0	0.0	0.0
Total Delay	26.1	4.2	13.8	25.0	34.9
Queue Length 50th (ft)	456	8	156	176	222
Queue Length 95th (ft)	#695	82	227	192	280
Internal Link Dist (ft)	861		179		
Turn Bay Length (ft)					
Base Capacity (vph)	2645	983	2808	1544	718
Starvation Cap Reductn	0	0	0	0	0
Spillback Cap Reductn	0	0	0	0	0
Storage Cap Reductn	0	0	0	0	0
Reduced v/c Ratio	0.90	0.55	0.46	0.50	0.65

Intersection Summary

95th percentile volume exceeds capacity, queue may be longer.
Queue shown is maximum after two cycles.

Lane Group	EBT	EBR	WBT	NBL	NBR
Lane Group Flow (vph)	1021	188	2505	1551	348
v/c Ratio	0.57	0.30	1.32	0.83	0.40
Control Delay	24.5	4.7	175.3	21.6	12.3
Queue Delay	0.0	0.0	0.0	0.0	0.0
Total Delay	24.5	4.7	175.3	21.6	12.3
Queue Length 50th (ft)	181	0	~702	338	96
Queue Length 95th (ft)	232	51	#808	412	149
Internal Link Dist (ft)	861		179		
Turn Bay Length (ft)					
Base Capacity (vph)	1789	626	1897	1964	914
Starvation Cap Reductn	0	0	0	0	0
Spillback Cap Reductn	0	0	0	0	0
Storage Cap Reductn	0	0	0	0	0
Reduced v/c Ratio	0.57	0.30	1.32	0.79	0.38

Intersection Summary

~ Volume exceeds capacity, queue is theoretically infinite.
Queue shown is maximum after two cycles.

95th percentile volume exceeds capacity, queue may be longer.
Queue shown is maximum after two cycles.

Lane Group	EBT	EBR	WBT	NBL	NBR
Lane Group Flow (vph)	2498	544	1323	791	465
v/c Ratio	0.95	0.56	0.47	0.63	0.79
Control Delay	30.2	4.7	14.0	25.2	34.7
Queue Delay	0.0	0.0	0.0	0.0	0.0
Total Delay	30.2	4.7	14.0	25.2	34.7
Queue Length 50th (ft)	498	15	161	184	222
Queue Length 95th (ft)	#744	101	234	199	280
Internal Link Dist (ft)	861		179		
Turn Bay Length (ft)					
Base Capacity (vph)	2640	972	2802	1544	718
Starvation Cap Reductn	0	0	0	0	0
Spillback Cap Reductn	0	0	0	0	0
Storage Cap Reductn	0	0	0	0	0
Reduced v/c Ratio	0.95	0.56	0.47	0.51	0.65

Intersection Summary

95th percentile volume exceeds capacity, queue may be longer.
Queue shown is maximum after two cycles.